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# Suburban

Moving & Storage Co. 2100 Ogden Avenue

Lisle, IL 60532 (630) 971-1000 Fax (630) 971-6601

February 19, 2002

U.S. Environmental Protection Agency Attn.: Carol Ropski Emergency Enforcement and Support Section, SE-5J 77 West Jackson Blvd. Chicago IL 60604-3590

## Dear Ms. Ropski:

The following three pages answer questions contained in "Attachment B" to Richard C. Karl's letter of January 30, 2002. Page 4 of the attached identifies the 14 individual attachments that provide information relative to certain questions.

Following the attachment listings page are the individual attachments themselves. The responses given and the detail provided is as complete and accurate as can be located. I apologize for the clarity and quality of some of the information included.

If you have any questions or concerns, please contact me.

James M. Radlein

President

# Attachment B Requests

#### Responses:

- 1. Mr. Ronald W. Schrack, P.E. President: Schrack Environmental Consulting
- 2. PRC Environmental Management, Inc. Preliminary Assessment/Visual Site Inspection Final Report. Prepared for:

U.S. Environmental Protection Agency Office of Waste Programs Enforcement Washington DC 20406

The Green Environmental Group copy of letter to: American National Bank, dated November 14, 1997.

SITE Environment Services, Inc. report on groundwater monitoring wells, dated December 9, 1994.

Environmental Protection Agency "No further action" letter, dated March 1, 1996, regarding LUST cleanup at 2400 Wisconsin Ave.

- 3. None
- 4. None; our use of this facility did not/does not generate any hazardous substances as defined in CERCLA. See the Green Environmental Group letter referenced in #2 regarding 2333 Wisconsin Ave.
- 5. No.
- 6. We are a household goods and office furnishings and equipment moving and storage company. We had operations at 2400 Wisconsin Ave. and have continuing operations at 2333 Wisconsin Ave., both locations a part of the "Site" described in #11 of Attachment "A", Information Requests to your letter of January 30, 2002.
- 7. 2400 Wisconsin Ave., 1971 through 1994 2333 Wisconsin Ave., 1988 through present

## Suburban United



- 8. a) Attachment 5 through 9 are photocopies of blueprints which describe activity at 2333 Wisconsin Ave. from 1961 through 1990, regarding building construction and property boundaries. Attachments 11 through 14 describe 2400 Wisconsin Ave.
  - b) See Attachment 10 for approximate location of water main and sewer connection at 2333 Wisconsin Ave.
  - c) See Attachments identified in (a).
  - d) This does not apply to Suburban's use of 2333 Wisconsin Ave. See SITE Report of 12/9/94 for groundwater monitoring wells at 2400 Wisconsin Ave., Attachment 4.
  - e) No septic systems or sub-surface disposal fields. Storm water drainage is the Village's storm water system.
  - f) See Attachments 5 through 14.
  - g) See Attachments 5 through 14. Originals on file at Suburban Moving and Storage Company's main office, 2100 Ogden Ave., Lisle IL 60532.
- 9. Storage tanks at 2400 Wisconsin Ave. were for petroleum storage and dispensing. They were not solid waste management units. Suburban Moving and Storage did not, does not and will not handle storage of hazardous substances at 2333 Wisconsin Ave. nor at 2400 Wisconsin Ave. when it owned and operated that location. See "Green" letter of 11/14/97 (Attachment 2).

10.a) 2333 Wisconsin Ave.:

Liberty Wire

1961 through 1988

Suburban Moving & Storage

1988 to present

2400 Wisconsin Ave.:

Suburban Moving & Storage

1971 through 1994

Burnside Construction

1994 to present

- b) not applicable
- c) not applicable

11. See # 10.

## Suburban United



13. No.

14. No.

- 15. See SITE Report, Attachment 4.
- 16. During Suburban Moving and Storage Company's ownership and operation, hazardous materials were not handled or stored. Truck fuel storage and dispensing tank were identified as having leaked. The tanks were removed under the ILEPA LUST program, and a "No Further Action" dated March 1, 1996, was issued.

17. No.

- 18. No.
- 19. a) 2333 Wisconsin Ave. No. 2400 Wisconsin Ave. Yes.
  - b) West side of building, north of scale platform and south of building mid-points.
  - c) Transported to:

Envirotech, 1800 N. Ashley Rd., Morris IL.

- d) 1991
- e) SITE Environmental Service.
- f) LUST remediation.
- g) No.
- h) See SITE Report (Attachment 4).
- i) Site Environmental Services.
- 20. None. See reports.
- 21. Refuse disposal via Waste Management and Arc Disposal.

## Suburban United



# Suburban

Moving & Storage Co. 2100 Ogden Avenue Lisle, IL 60532 (630) 971-1000 Fax (630) 971-6601



#### Attachments:

- 1. PRC Report on 2333 Wisconsin Ave. . .
- 2. The "Green" letter of November 14, 1997 on 2333 Wisconsin Ave.
- 3. EPA-Illinois "no further action" letter dated March 1, 1996 for 2400 Wisconsin Ave.
- 4. SITE Closure Report for 2400 Wisconsin Ave.
- 5. 2333 Wisconsin Ave.: original building constructed in 1961.
- 6. 2333 Wisconsin Ave.: 1963 addition.
- 7. 2333 Wisconsin Ave.: 1965 addition.
- 8. 2333 Wisconsin Ave.: 1967 addition.
- 2333 Wisconsin Ave.: Current footprint.
   Note: unable to locate prints for 4<sup>th</sup> addition to building by original owners, nor building addition by Suburban Moving and Storage.
- 10.2333 Wisconsin Ave.: Water and sewer service to building.
- 11.2400 Wisconsin Ave.: Plat of Survey
- 12.2400 Wisconsin Ave.: Original building, 1971
- 13.2400 Wisconsin Ave., Addition, 1972
- 14.2400 Wisconsin Ave., 1971 foundation plan.



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

## 77 WEST JACKSON BOULEVARD

CMICAGO, IL | SCEN4-3590

REPLY TO THE ATTENTION OF

HRE-8J.

April 21, 1993

Mr. Jack Sorenson Manager Suburban Self Storage 2333 Wisconsin Avenue Downers Grove, Illinois 60515

2333 Wiscon-in

Re:

Visual Site Inspection Suburban Self Storage Facility (Formerly Liberty Copper and Wire Company Facility) Downers Grove, Illinois

ILD 047 033 188

Dear Mr. Sorenson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

KMI

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch

**ATTACHMENT 1** 

PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118



#### PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

SUBURBAN SELF STORAGE FACILITY (FORMERLY LIBERTY COPPER AND WIRE COMPANY FACILITY) DOWNERS GROVE, ILLINOIS ILD 047 033 188

#### FINAL REPORT

## Prepared for

# U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : C05087

EPA Region : 5

 Site No.
 :
 ILD 047 033 188

 Date Prepared
 :
 March 2, 1993

 Contract No.
 :
 68-W9-0006

PRC No. : 009-C05087IL5U
Prepared by : Dynamac Corporation

(Valerie Farrell)

Telephone No. : (312) 466-0222 Contractor Project Manager : Shin Ahn

Telephone No. : (312) 856-8700 EPA Work Assignment Manager: : Kevin Pierard Telephone No. : (312) 886-4448

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## LIST OF WITHHELD DOCUMENTS

I have reviewed the documents in the Illinois Environmental	• · · · · · · · · · · · · · · · · · · ·
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Facility Name: Liberty Capped + Win	
and, consistent with the obligations of the Agency under So Protection Act and the Illinois Freedom of Information Act, documents from the file and inserted such documents in Documents".	ection 7 of the Environmental I have removed the following
Document  Date General Description of Document	Reason for Withholding
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removed the following numbered documents:	
(Signature)	(Date)

#### 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Suburban Self Storage (SSS), facility (formerly the Liberty Copper and Wire Company facility) in the Village of Downers Grove (Downers Grove), Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition applies to the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

identify SWMUs and AOCs at the facility

- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other information needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the SSS facility (EPA Identification No. ILD 047 033 188) in Downers Grove, DuPage County, Illinois. The PA was completed on September 3, 1992. Dynamac gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) offices in Springfield, Illinois, and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), and the U.S. Geological Survey (USGS).

Valerie Farrell and Russ Crittenden of Dynamac conducted the VSI on November 3, 1992. It included an interview with a facility representative and a walk-through inspection of the facility. Dynamac identified four SWMUs and no AOCs at the facility.

Dynamic completed EPA Form 2070-12 using information gathered during the PA/VII. To fower is included in Attachment A. The VSI is summarized and three inspection photographs are included in Attachment B. Field notes from the VS' are included in Attachment C.

#### 2.0 FACILITY DESCRIPTION

This section describes the facility's location past and present operations; white generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

#### 2.1 FACILITY LOCATION

The SSS facility is located at 2333 Wisconsin Avenue, in Downers Grove, DuPage County, Illinois. Figure 1 shows the location of the facility in relation to surrounding topographic features (latitude 41° 47' 20" N and longitude 88° 02' 00" W)(USGS, 1962 and Liberty, 1980b). The facility occupies approximately 3 acres in the Ellsworth Business Park, which is surrounded by mixed commercial and residential area.

The facility is bordered on the north by Wisconsin Avenue followed by commercial office buildings; on the west by Janes Street followed by Bearing Fasteners, Inc., Data Processing Center; on the south by Inverness Avenue followed by residences; and on the east by a Tricon, Inc., manufacturing facility.

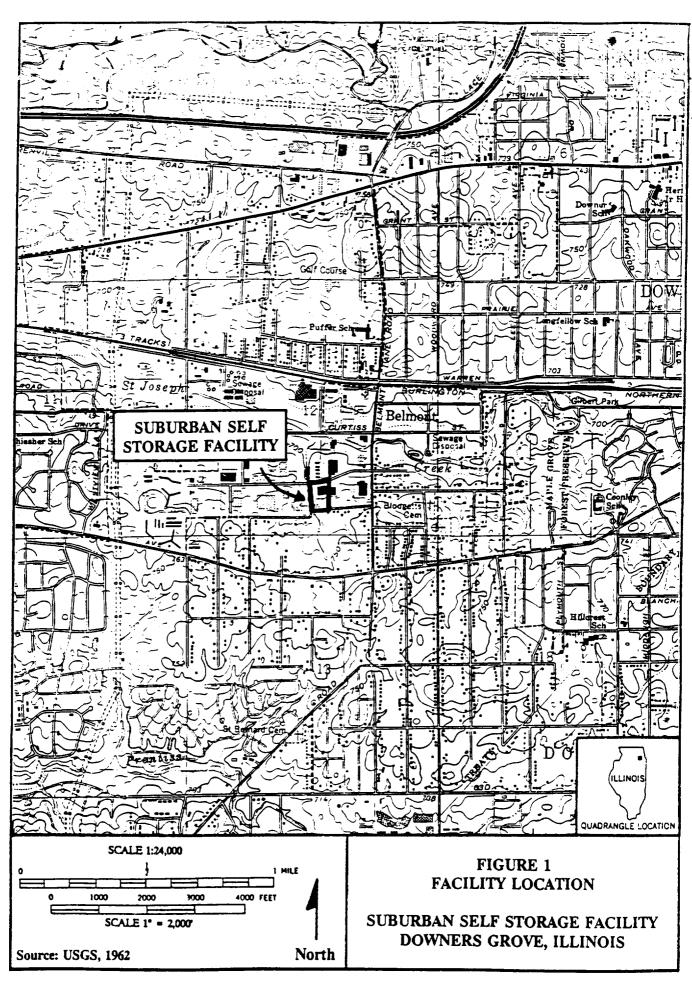
#### 2.2 FACILITY OPERATIONS

Since approximately June 1987, the facility has been owned and operated by SSS. SSS leases individual storage lockers to customers and leases a large warehouse space to American Telephone and Telegraph (AT&T). SSS and AT&T do not conduct any manufacturing operations or generate any waste containing hazardous constituents at this facility.

In 1990, SSS added a 19,000-square-foot addition to the west side of the facility building. The facility currently consists of an 84,550-square-foot building and an 43,000-square-foot outdoor paved parking area. SSS stores all goods inside the building and employs four people at this facility.

From approximately 1960 to 1986, the facility was operated by Liberty Copper and Wire Company (Liberty). Liberty manufactured copper wire for electrical purposes; operations included drawing, enamel coating, and electroplating. Finished products and raw materials such as solvents, plating bath solutions, and coatings were stored in 55-gallon drums inside the building.

From approximately 1960 to 1984, Liberty was a wholly-owned subsidiary of Litton Industries, Inc. (Litton). In 1984, Litton sold all of Liberty's assets to MagneTek, Inc. (MagneTek). Liberty continued operations as a wholly-owned subsidiary of MagneTek until manufacturing operations ceased at this location in 1986.



Detailed information regarding past operations was not available in EPA or IEPA fines at the time por the PA/VSI. Medidition, the Magna Tek representative contacted by Dynamac was unable to obtain files associated with Liberty.

Solid wastes generated from former facility operations and SWMUs where they were managed are discussed in detail in Section 2.3.

#### 2.3 WASTE GENERATION AND MANAGEMENT

SSS does not and has not generated or managed any hazardous waste at this facility. The only waste currently generated at the facility is nonhazardous municipal trash. Prior to 1986, the facility generated waste enamel and solvent (F003, F004, F005, D001), electroplating sludge (F006), waste phenol (U188), waste urethane (U238), and electroplating wash water (Liberty, 1980b).

Prior to 1986, wastes were generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes, are discussed below.

Prior to 1986, Liberty generated waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001) from coating and clean-up operations and from the disposal of off-specification coating mixtures. The waste was collected in 55-gallon steel drums and stored in the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3). In 1985, Liberty generated approximately 9,000 pounds of waste enamel and solvent. This waste was shipped off site by Aqua-Tech, Inc., of Port Washington, Wisconsin, to Seaboard Chemical in Jamestown, North Carolina, for fuel blending (Liberty, 1980b and Liberty, 1986b).

Prior to 1985, Liberty generated electroplating sludge (F006) during the clean-out of the electroplating baths at the facility. Liberty employees periodically shoveled the sludge from the baths into 55-gallon steel drums. The drums were stored in the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3). According to Liberty's Part A permit application (Part A), the facility generated approximately 7,650 pounds of this waste per year. Information regarding the transporter, treatment, storage, or disposal (TSD) facility, and ultimate disposition of this waste was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Prior to 1986, Liberty used phenol and urethane in the mixing of enamel coatings and occasionally generated waste phenol (U188) and waste urethane (U238) from the disposal

TABLE 1
LOUID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit <sup>a</sup>	Status
1	Former Outdoor Drummed Waste Storage Area	Yes	Inactive since 1986; RCRA closed in 1987.
2	Former Indoor Drummed Waste Storage Area West	Yes <sup>b</sup>	Inactive since 1986; removed in 1987.
3	Former Indoor Drummed Waste Storage Area East	Yes <sup>c</sup>	Inactive since 1986; RCRA closed in 1987.
4	Former Neutralization Tank	No	Inactive since 1986; removed in 1987.

#### Notes:

- A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.
- Although this unit was identified on Liberty's Part A as a RCRA hazardous waste management unit, it was not included on the facility's approved closure plan and did not undergo RCRA closure. According to a 1987 closure verification inspection report, facility representatives stated that the unit did not manage hazardous waste, but was used solely for raw material storage (IEPA, 1987b).
- Although this unit was not identified on Liberty's Part A as a RCRA hazardous waste management unit, it was included in the facility's approved closure plan and underwent RCRA closure activities in 1987 (IEPA, 1987b).

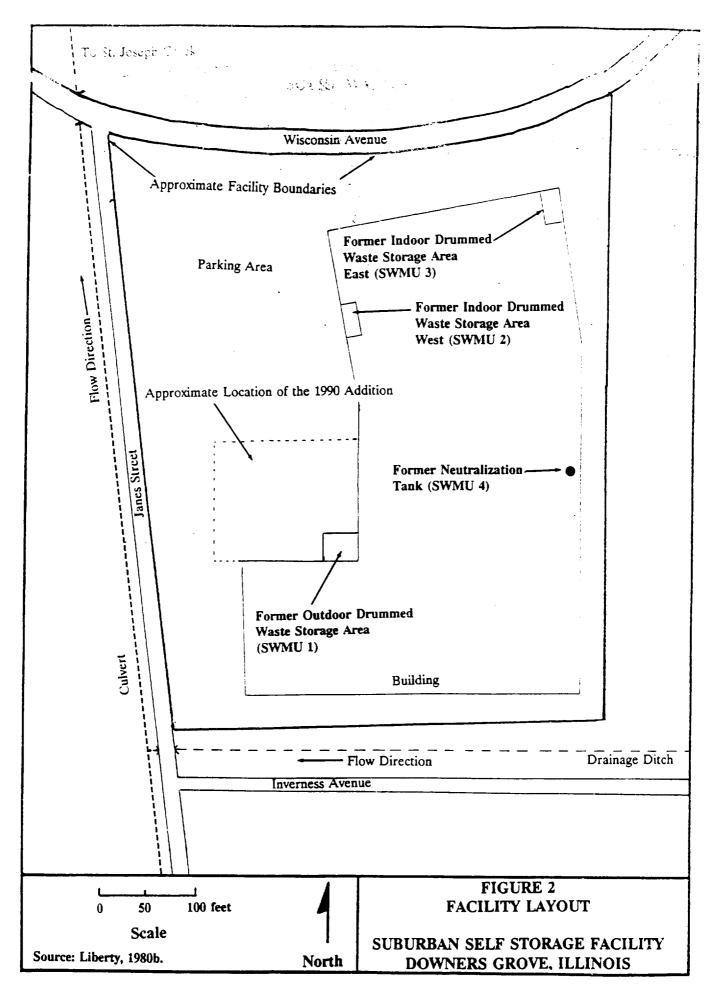


TABLE 2

Waste/EPA Waste Code	Source	Solid Waste Management Unit
Waste Enamel and Solvent/ (F003, F004, F005, D001)	Coating and clean-up operations and disposal of off-specification coating mixtures.	1 and 3
Electroplating Sludge/ (F006)	Electroplating operation	1 and 3
Waste Phenol/(U188)	Disposal of off-specification product	1 and 3
Waste Urethane/(U238)	Disposal of off-specification product	1 and 3
Electroplating wash water <sup>a</sup>	Electroplating operation	4

#### Note:

Information regarding the constituents of the electroplating wash water was not available in EPA, IEPA, or facility files at the time of the PA/VSI. This waste was pre-treated prior to discharge via the sanitary sewer to the Downers Grove Sanitary District publicly owned treatment works (POTW) (Liberty, 1984).

of off-specification yrollars. The wastes were accumulated in 55 gallon drams and stored in the Former Outdoor-Franking Wastesperage Area (SWMU1) and the Former Indoor Drummed Waste Storage Area East (SWMU3). According to Liberty's Part A, the facility generated 200 pounds of waste phenol (U188) and 400 pounds of waste urethane (U238) per year (Liberty, 1980b). Information regarding the transporter, TSD facility, and ultimate disposition of these wastes was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Prior to 1985, Liberty generated electroplating wash water from a rinsing process associated with the electroplating operation at the facility (Liberty, 1984). Specific information regarding the constituents, generation, and management of this waste was not available in EPA, IEPA, or facility files at the time of the PA/VSI. According to a Compliance Inquiry Letter (CIL) from IEPA to Liberty, the pH of the electroplating wash water was adjusted in the Former Neutralization Tank (SWMU 4) (IEPA, 1985b). The pretreated water was then discharged via the sanitary sewer to the Downers Grove Sanitary District POTW (Liberty, 1984).

#### 2.4 HISTORY OF DOCUMENTED RELEASES

During RCRA closure activities in 1987, Liberty documented soil contaminated with up to 57,100 parts per million (ppm) of xylene under the cracked portion of the concrete pad associated with the Former Outdoor Drummed Waste Storage Area (SWMU 1). Liberty submitted analytical results of soil samples collected in the vicinity of SWMU 1 and certification of closure from a registered Professional Engineer to the IEPA on March 2, 1987. According to a letter from IEPA to Liberty, analysis of soil samples indicated that the contamination was confined to the upper two feet of soil (IEPA, 1987a). Although information regarding whether the contaminated soil was ever removed was not available in EPA, IEPA, or facility files, IEPA approved RCRA closure activities at this unit in 1987.

#### 2.5 REGULATORY HISTORY

Liberty submitted a Notification of Hazardous Waste Activity (Notification) form to EPA on July 30, 1980 (Liberty, 1980a). Liberty submitted a Part A to EPA on December 31, 1980, identifying the facility as a generator and storage facility. The Part A listed the following process codes and capacities: a container storage (S01) capacity of 2,000 gallons and a tank treatment (T01) capacity of 400 gallons per day. The Part A also listed the facility as generating the following waste codes and estimated annual quantities: 3,800 pounds of (F003) waste; 3,600 pounds of (F004) waste; 1,600 pounds of (F005) waste; 2,000 pounds of (F006) waste; 400 pounds of (F007) waste; 1,000 pounds of (F008) waste; 4,250 pounds of (F009) waste; 200 pounds of (U188) waste; and 400 pounds of (U238) waste (Liberty, 1980b).

The 2,000-gallon S01 unit referred to both the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area West

(SWMU2). The 400 ga has 701 unit referred to the Former Neutralization Took (SWMU3). Although Liberty hand wastes separated on the Part A, the facility combined all of the coating wastes and man ged them as a single waste stream (waste enamel and solvent (F003, F004, F005, D001)) and all of the electroplating wastes and managed them as a single waste stream (electroplating sludge (F006)). According to a January 1982 RCRA inspection report, the facility listed F007, F008, and F009 on the Part A erroneously because it did not use cyanide in the plating solutions (IEPA, 1982).

According to a 1986 letter from IEPA to Liberty, the Former Neutralization Tank (SWMU 4) was identified on Liberty's Part A erroneously because it was a wastewater pretreatment unit and was therefore exempt from regulation under RCRA (IEPA, 1986a and IEPA, 1987a). Although the Former Indoor Drummed Waste Storage Area East (SWMU 3) was not identified on the facility's Part A, it was used for the storage of 55-gallon drums containing hazardous waste (IEPA, 1987a).

Liberty submitted a closure plan for the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3) to IEPA on January 10, 1986. IEPA approved the facility's closure plan on June 9, 1986 (IEPA, 1986a). On December 1, 1986, Liberty ceased all manufacturing operations at the facility and began closure activities. During closure activities, Liberty documented soil contaminated with xylene under the cracked concrete pad at SWMU 1. Liberty submitted analytical results of soil samples collected in the vicinity of SWMU 1 and certification of closure from a registered Professional Engineer to the IEPA on March 2, 1987. According to a letter from IEPA, to Liberty, analysis of soil samples indicated that the contamination was confined to the upper two feet of soil (IEPA, 1987a). Information regarding whether the contaminated soil was ever removed was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

According to a December 17, 1987, closure verification inspection report, the facility conducted closure activities for the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3) in accordance with the facility's approved closure plan. The inspection report states that the Former Indoor Drummed Waste Storage Area West (SWMU 2) was not included in the facility's closure plan and did not undergo RCRA closure. The inspection report also indicates that at the time of the inspection, the Liberty representative stated that SWMU 2 was never used to store hazardous wastes, but was only used solely for raw material storage (IEPA, 1987b). Additional information regarding closure activities was not available in EPA, IEPA, or facility files at the time of the PA/VSI. According to Warren Weritz of IEPA, the facility is not currently regulated under RCRA (Dynamac, 1992b).

In October 1982, EPA issued a Consent Agreement and Final Order (CAFO) to Liberty because they did not submit a Part A to EPA by November 19, 1980, and were therefore, operating a hazardous waste management facility without a permit or interim status (EPA, 1982). By signing the CAFO, Liberty achieved interim status. The facility

operated under interior status from 1982 to 1986 when they submitted a closure plan and a request to withdraw the Part A. Liberty subsequently submitted a letter to IEPA indicating that the facility was not operating as a storage facility and requested that the Part A be withdrawn (Liberty, 1986a).

IEPA conducted RCRA inspections at the facility in January 1982 and November 1985 and identified apparent violations and deficiencies in paper work related to the following areas: the waste analysis plan; personnel training records; the contingency plan; the operating record; the closure plan and closure cost estimate (IEPA, 1982 and IEPA, 1985a).

According to a February 19, 1986, IEPA memorandum to the Liberty file, a Pre-Enforcement Compliance Conference was conducted between IEPA and Liberty. The conference outlined the apparent violations identified during the November 1985 RCRA inspection, and developed a plan and schedule to bring the facility into compliance (IEPA, 1986b). Although information regarding whether the facility resolved the apparent violations was not available in EPA, IEPA, or facility files, the facility is not currently regulated under RCRA.

There is no documentation in EPA, MagneTek, or facility files regarding whether the facility was required to have an air operating permit. In addition, the IEPA Division of Air Pollution Control did not have any file information pertaining to the facility.

The facility did not discharge to any open waterways and was therefore not required to have a National Pollutant Discharge Elimination System (NPDES) permit. The facility did have a permit (Permit No. 33IL0028380) to discharge pre-treated wastewater from the Former Neutralization Tank (SWMU 4) to the Downers Grove Sanitary District POTW via the sanitary sewer system. According to a July 1984, letter from Liberty to EPA, the facility conducted periodic monitoring of the discharge and was within the effluent limitations of the permit (Liberty, 1984). There was no documentation of violations associated with the wastewater discharge in EPA, IEPA, MagneTek, or facility files at the time of the PA/VSI.

There is no documentation in EPA, IEPA, Magnetek, or facility files of any Superfund (CERCLA) activity at the facility. In addition, there is no documentation of any underground storage tanks (UST) at the facility.

#### 2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the SSS facility.

#### 2.6.1 Climate

The facility is located approximately 10 miles southwest of O'Hare International Airport, the nearest National Weather Service station. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located approximately 18 miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2 degrees Fahrenheit (°F). The highest average daily temperature is 73.0 °F in July, and the lowest average daily temperature is 21.4 °F in January (NOAA, 1990).

Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The one-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at an average of 12 miles per hour from the west-southwest (NOAA, 1990).

#### 2.6.2 Flood Plain and Surface Water

The SSS facility is located in an area of minimal flooding, outside the 100-year or 500-year flood plain of any surface water body (FEMA, 1981). The nearest surface water body, St. Joseph Creek, is located approximately 0.25 mile north of the facility and is used for storm water collection (Dynamac, 1992a). St. Joseph Creek flows west and discharges to the East Branch of the DuPage River (USGS, 1962).

Surface water runoff at the facility is towards a drainage ditch located on the south side of the facility. The drainage ditch flows west towards a culvert located on the west side of Janes Street. The culvert flows north and discharges to St. Joseph Creek approximately 0.25 mile north of the facility (IEPA, 1980 and Dynamac, 1992a).

#### 2.6.3 Geology and Soils

The soils of the SSS facility are mapped as Urban land/Orthents Complex. This soil group consists of clayey soils that have been altered or mixed as a result of urban development. Nearby soil areas are mapped as Markham silt loam and Ashkum silty clay loam, either alone or in complexes with urban land. The Markham silt loam is a deep, moderately well drained, moderately slowly permeable soil developed in thin loess on upland till plains. The Ashkum silty clay loam is a deep, poorly drained, moderately slowly permeable soil also developed in thin loess on upland till plains (SCS, 1979).

The surficial deposits surrounding the area of the SSS facility are mapped as the Wadsworth Till Member of the Wedron Formation. The Wadsworth Till is a thick and extensive, gray silty clay loam glacial till with few pebbles and cobbles. Some isolated lenses of sand and gravel may be present in the subsurface of the till (Lineback, 1979). The total thickness of the glacial deposits is approximately 85 feet in the area of the facility (Willman, 1971).

The bedrock underlying the glacial deposits at the SSS facility consists of Silurian-age Colomite. The dolomite is approximately 150 feet thick in this area and includes portions of the Niagaran and Alexandrian Series dolomites. The Niagaran Series dolomite is largely composed of massive reef complexes of pure dolomite separated by zones of silty, argillaceous and cherty dolomite. The Alexandrian Series dolomites are well bedded, generally white or gray with cherty zones and occasional green or red shaly beds. Underlying these dolomites is the Ordovician-age Maquoketa Shale, which is red and oolitic at the top, and greenish gray and dolomitic at depth. The Maquoketa Shale is approximately 180 feet thick. Several thousand feet of Ordovician-age and Cambrian-age dolomites and sandstones underlie the Maquoketa Shale (Willman, 1971).

#### 2.6.4 Ground Water

No ground water information specific to the SSS facility was available at the time of the PA/VSI. Regionally, there are three aquifers: 1) a drift aquifer, 2) a shallow bedrock aquifer, and 3) a deep bedrock aquifer. The drift aquifer is limited to occasional sand and gravel lenses. The depth to ground water is not documented but is likely to be at approximately 25 feet below ground surface (bgs), corresponding to the elevation of St. Joseph Creek. Since St. Joseph Creek is a likely discharge area for the surficial aquifer, ground water flow in this aquifer is probably to the north. The drift aquifer is hydraulically connected to the underlying Silurian-age Dolomite, which comprises the shallow bedrock aquifer. The dolomite aquifer has variable characteristics due to variations in fracturing and solution openings. The shallow bedrock aquifer is approximately 150 feet thick, and is underlain by the Maquoketa Shale. Ground-water flow direction in the shallow bedrock aquifer is regionally to the east in this area. The deep bedrock aquifer underlies the Maquoketa Shale and comprises the Ordovician-age and Cambrian-age dolomites and sandstones. The Maquoketa Shale serves as a confining layer over the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). There are no monitoring wells at the facility. Regionally, ground water in the deep bedrock aquifer flows to the east (Schicht, Adams, and Stall, 1976).

Although the majority of Downers Grove receives drinking water from Lake Michigan via the DuPage County Water Commission, there are three smaller municipal water systems located on the periphery of the Downers Grove water supply boundaries that obtain drinking water from ground water wells (Dynamac, 1992a). The nearest of these systems is the Belmont-Highwood System which maintains one operating well and one back-up well and serves approximately 165 residences. The nearest well, the operating well, is located approximately 1,000 feet east of the facility. This well is most likely downgradient of the facility (USGS, 1962). According to Robert Tully of the Belmont-Highwood System, there are some private wells located approximately 0.75 mile north of the facility (Dynamac, 1992c). Information regarding the exact location of private wells was not available at the time of the PA/VSI.

#### 2.7 RECEPTORS

The facility occupies approximately 3 acres in the Ellsworth Business Park, which is surrounded by a mixed commercial and residential area in Downers Grove, Illinois, which had a 1990 population of 43,858 people (State of Illinois, 1991).

10 1/4 No. 3 1

The facility is bordered on the north by Wisconsin Avenue followed by commercial office buildings; on the west by Janes Street followed by Bearing Fasteners, Inc., Data Processing Center; on the south by Inverness Avenue followed by residences; and on the east by a Tricon, Inc., manufacturing facility. The nearest school, Puffer School, is located approximately 0.75 miles north of the facility. The nearest residences are located 0.25 mile south of the facility on the south side of Inverness Avenue. Although facility access is not restricted by a fence or security system, there are no wastes or raw materials currently stored outdoors, and the facility building is kept locked when not occupied.

The nearest surface water body, St. Joseph Creek, is located approximately 0.25 mile north of the facility and is used for storm water collection (Dynamac, 1992a). St. Joseph Creek flows west and discharges to the East Branch of the DuPage River (USGS, 1962). Surface water runoff at the facility is to the south towards a drainage ditch which discharges to St. Joseph Creek (IEPA, 1980 and Dynamac, 1992a).

Although the majority of Downers Grove receives drinking water from Lake Michigan via the DuPage County Water Commission, there are three smaller municipal water systems located on the periphery of the Downers Grove water supply boundaries that obtain drinking water from ground water wells (Dynamac, 1992a). The nearest of these systems is the Belmont-Highwood System which maintains one operating well and one back-up well and serves approximately 165 people. The nearest well, the operating well, is located approximately 1,000 feet east of the facility. This well is most likely downgradient of the facility (USGS, 1962). According to Robert Tully of the Belmont-Highwood System, there are some private wells located approximately 0.75 mile north of the facility (Dynamac, 1992c). Information regarding the exact location of private wells was not available at the time of the PA/VSI.

The nearest sensitive environment consists of a forested wetland that undergoes brief periods of flooding during the growing season and is dominated by broad leaved deciduous trees. The wetland is approximately 4 acres in size and is located along St. Joseph Creek about 0.33 mile northeast of the facility. There is another wetland located approximately 0.50 mile northwest of the facility that consists of an intermittently exposed, open water pond that is lacking vegetation (USDI, undated).

#### 3.0% OSA SAWASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1-

Former Outdoor Drummed Waste Storage Area

Unit Description:

The Former Outdoor Drummed Waste Storage Area was located along the west side of the building and consisted of a 1,172-square-foot concrete pad enclosed by a chain-link fence. The unit was used for the storage of 55-gallon drums containing hazardous waste generated at the facility. Surface water runoff in the vicinity of the unit is collected by a drainage ditch that runs along the south side of the facility and directs water to St.

Joseph Creek (IEPA, 1980).

Date of Startup:

This unit began operation at an unknown date prior to 1980.

Date of Closure:

This unit has been inactive since Liberty ceased operations at this facility in 1986. IEPA approve RCRA closure activities at

this unit in 1987.

Waste Managed:

This unit managed 55-gallon drums containing some or all of the following hazardous wastes: waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001); electroplating sludge (F006); waste phenol (U188); and waste urethane (U238). The waste enamel and solvent was shipped off site for fuel blending (Liberty, 1986b). Information regarding the ultimate disposition of the electroplating sludge, waste phenol, and waste urethane was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Release Controls:

This unit managed wastes in closed 55-gallons steel drums located outdoors on a concrete pad that was surrounded by a chain-link fence. Information regarding the height of the fence was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

History of

Pocumented released

soil contaminated with sylene at a maximum of 57,100 ppm under the cracked portion of the concrete pad at this unit. According to a letter from IEPA to Liberty, analysis of soil samples indicated that the contamination was confined to the upper two feet of soil (IEPA, 1987a). IEPA approved RCRA closure activities for this unit in 1987. Specific information regarding remediation and closure activities was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Observations:

At the time of the VSI, the area where this unit was formerly located was covered by an addition to the facility building built by SSS in 1990 (See Photo No. 2).

SWMU 2

Former Indoor Drummed Waste Storage Area West

Unit Description:

The Former Indoor Drummed Waste Storage Area West consisted of a 450-square-foot concrete-floored area located indoors near the northwest corner of the building. The Part A indicated that the unit was used to store 55-gallon drums of hazardous waste generated at the facility. According to the 1987 closure verification inspection report, facility representatives stated that this unit was never used to store wastes, but was used solely for raw material storage. The unit has been inactive since Liberty ceased operations at the facility in 1986. There were no floor drains in the area where this unit was formerly located.

Date of Startup:

This unit began operation at an unknown date prior to 1980.

Date of Closure:

This unit has been inactive since operations ceased at this facility in 1986. Although this unit was identified on Liberty's Part A as a RCRA hazardous waste management unit, it was not included on the facility's closure plan and did not undergo RCRA closure activities. According to a December 17, 1987, closure verification inspection report, the facility representative stated that this unit was never used to store hazardous waste, but was used solely for raw material storage (IEPA, 1987b).

Wastes Managed:

This unit did not manage wastes, but was used solely for storage of 55-gallon drums containing raw materials.

Release Controle:

gainen steel drums tocated indoors on a concrete floor with no floor drains.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

At the time of the VSI, the concrete-floored area where this unit was formerly located was in sound condition and did not contain any stains or evidence of a previous release (See Photo No. 1).

SWMU 3

Former Indoor Drummed Waste Storage Area East

Unit Description:

The Former Indoor Drummed Waste Storage Area East consisted of a concrete-floored area located indoors near the northeast corner of the building. The unit was used to store 55-gallon drums containing hazardous waste generated at the facility. The unit has been inactive since Liberty ceased operations at the facility in 1986. This unit was identified as a SWMU subsequent to the VSI, therefore Dynamac did not observe the area where this unit was located. Information regarding the size and capacity of the unit, and the location of nearby floor drains was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Date of Startup:

This unit began operation at an unknown date prior to 1980.

Date of Closure:

This unit has been inactive since operations ceased at this facility in 1986. IEPA approved RCRA closure activities at this unit in 1987.

Wastes Managed:

This unit managed 55-gallon drums containing some or all of the following hazardous wastes: waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001); electroplating sludge (F006); waste phenol (U188); waste urethane (U238). The waste enamel and solvent was shipped off site for disposal via secondary fuel blending (Liberty, 1986b). Information regarding the ultimate disposition of the electroplating sludge, waste phenol, waste urethane was not available in EPA, IEPA, or facility files at the time of the PA/VSI.

Release Controls:

The Arthuranaged wastes in closed 55-gallons steel drums tocated incloors on a generate floor with no cloor drains.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

Although this unit was identified as a SWMU based on information obtained subsequent to the VSI, Dynamac did observe the general area where this unit was formerly located. The concrete floor was not cracked or stained and did not show any evidence of the previous use.

SWMU 4

Former Neutralization Tank

Unit Description:

The Former Neutralization Tank consisted of a 500-gallon steel tank located on a concrete floor along the east side of the building. The unit was used to adjust the pH of the electroplating wash water generated by a rinsing process associated with the electroplating operation at the facility. There were no floor drains in the area where this unit was formerly located.

Date of Startup:

This unit began operation at an unknown date prior to 1980.

Date of Closure:

This unit has been inactive since operations ceased at the facility in 1986 and was removed from the facility in 1987. Although this unit was identified on Liberty's Part A as a RCRA hazardous waste management unit, it was a wastewater pre-treatment unit and therefore exempt from regulation under RCRA.

Wastes Managed:

This unit managed electroplating wash water generated by a rinsing process associated with the electroplating operation. Specific information regarding the constituents of the waste was not available in EPA, IEPA, or facility files at the time of the PA/VSI. The facility discharged the pre-treated water to the Downers Grove Sanitary District POTW (Liberty, 1984).

Release Controls:

This unit was constructed of steel and was located indoors on a concrete floor with no floor drains.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

Dynamics did not observe this unit during the VSI because it had been removed from the facility during renovation activities beginning in 1986. The concrete-floored area where this unit was formerly located did not show any evidence of a previous release (See Photo No. 3).

# RESES OF CONCERN

Dynamac did not observe any AOCs at the time of the PA/VSI.

#### SPERMINETERENCES

- Dynamac Corporation (Dynamac), 1002a. Telephone conversation between Charlie Fisher of the Village of Downers Grove Water Department and Valerie Farrell of Dynamac, regarding drinking water supplies and the use of St. Joseph Creek, December 8.
- Dynamao, 1992b. Telephone conversation between Warren Weritz of the Illinois Environmental Protection Agency (IEPA) and Valerie Farrell of Dynamac, regarding closure activities and regulatory status of the SSS facility, December 14.
- Dynamac, 1992c. Telephone conversation between Robert Tully of the Belmont-Highwood Water System and Valerie Farrell of Dynamac, regarding drinking water wells in the vicinity of the facility, December 22.
- Federal Emergency Management Agency (FEMA), 1981. Flood insurance rate map for the Village of Downers Grove, DuPage County, Illinois, April 15.
- Hughes, G.M., P. Kraatz, and R.A. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, circular 406.
- Illinois Environmental Protection Agency (IEPA), 1980. Complaint Investigation Form prepared by Cliff Gould, IEPA, regarding surface water run-off at the Liberty facility, October 15.
- IEPA, 1982. RCRA inspection report prepared by Chuck Gruntman of IEPA for the Liberty facility, January 14.
- IEPA, 1985a. RCRA inspection report prepared by Jim Wiggins of IEPA for the Liberty facility, November 26.
- IEPA, 1985b. Compliance Inquiry Letter (CIL) for the Liberty facility prepared by Major Hearn, Jr. of IEPA, December 13.
- IEPA, 1986a. Letter from IEPA to Liberty approving the facility's closure plan, June 9.
- IEPA, 1986b. IEPA memorandum to the file regarding the Pre-Enforcement Compliance Conference for the Liberty facility, February 19.
- IEPA, 1987a. Letter from IEPA to Liberty regarding the RCRA closure activities, documented soil contamination, and required further actions, June 2.

#### KERTALE SCES (Continued)

- IEFA, 1987b. Closure verification inspection report for the Liberty facility prepared by Chuck Gruntman, IEPA, December 17.
- Liberty Copper and Wire Company (Liberty), 1980a. Notification of Hazardous Waste Activity, July 30.
- Liberty, 1980b. Part A permit application (Part A), December 31.
- Liberty, 1984. Letter from Liberty to U.S. EPA regarding wastewater pre-treatment and discharge at the facility, July 19.
- Liberty, 1986a. Letter from Liberty to IEPA requesting that the facility's Part A be withdrawn and the Closure Plan for the Former Outdoor Drummed Waste Storage Area (SWMU 1) and the Former Indoor Drummed Waste Storage Area East (SWMU 3), January 10.
- Liberty, 1986b. Generator Annual Hazardous Waste Report prepared by Liberty, February 24.
- Lineback, J.A., 1979. Quaternary Deposits in Illinois, Map 1:500,000.
- National Oceanic and Atmospheric Administration (NOAA), 1979. Climatography of the U.S., Ashville, North Carolina.
- NOAA, 1990. Local Climatological Data for O'Hare International Airport, Illinois.
- Schict, R.J., J.R. Adams, and J.B. Stall, 1976. "Water Resources and Availability, Quality, and Cost in Northeastern Illinois," Illinois State Water Survey Report of Investigation 83.
- Soil Conservation Service (SCS), 1979. Soil Survey of DuPage and Part of Cook Counties, Illinois, May.
- State of Illinois, 1991. Official Illinois Highway Map.
- U. S. Department of the Interior (USDI), Undated. National Wetlands Inventory Map, 1:24,000 scale, Wheaton, Illinois Quadrangle. Based on aerial photographs taken in April 1983.
- U. S. Geological Survey (USGS), 1962. 7.5 Minute Series Topographic Map, Wheaton, Illinois Quadrangle, photorevised 1972 and 1980.

## REFERENCES (Continued)

- U. L. Environmental Protection Agency (EPA), 1932. Consent Agreement and Final Order issued to Liberty for operating a hazardous waste management facility without a permit or interim status, October 19.
- Willman, H.B., 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey.

## ATTACHMENT A

**EPA PRELIMINARY ASSESSMENT FORM 2070-12** 



# POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 1 SQLIES SECRETARION AND ASSESSMENT

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III. RESPONSIBL	E PARTIES						•			
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Suburban Self S	torage			2333 Wisc	consin Avenue					
03 CITY	·			04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER				
Downers Grove					60515	(616) 278-0251	<u> </u>			
07 OPERATOR LIT KN	own and different from o	wner)		08 STREE	T (Business, ma	uling, residential)				
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i de la companya de l										
The only waste currently generated at the facility consists of nonhazardous municipal trash.  05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION										
The facility documented soil contaminated with xylene at 57,100 parts per million under the cracked concrete pad associated with the Former Outdoor Drummed Waste										
Storage Area (SWMU 1). Analysis of soil samples indicated that contamination was confined to the upper two feet of soil. There is no documentation whether the contaminated soils were removed.										
V. PRIORITY AS				<del></del>						
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Valerie Farreil				Dynamac	Corporation	(312) 466-0222	11 / 03 / 92 MONTH DAY YEAR			
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## ATTACHMENT B

# VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

### VISUAL SITE INSPECTION SUMMARY

# 2333 WISCONNIN A "ENUE" DOWNERS GROVE, ILLINOIS 60515 ILD 047 033 188

Date:

November 3, 1992

Primary Facility

Representative:

Jack Sorenson, Manager

Representative

Telephone No.:

(708) 964-6622

Inspection Team:

Valerie Farrell, Dynamac Corporation Russ Crittenden, Dynamac Corporation

Photographer:

Russ Crittenden, Dynamac Corporation

Weather Conditions:

Overcast, approximately 40° Fahrenheit

Summary of Activities:

The visual site inspection (VSI) began at 9:15 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. The facility representative then discussed the facility's current operations, solid wastes generated, and release history. Suburban Self Storage has been operating at this location since 1987; the only waste currently generated at the facility is nonhazardous municipal trash. The facility representative did not have any information regarding past operations at the facility.

The VSI tour began at approximately 9:45 a.m. The inspection team first walked through the building and observed the area where the Former Indoor Drummed Waste Storage Area West (SWMU 2), the Former Outdoor Drummed Waste Storage Area (SWMU 1), and the Former Neutralization Tank (SWMU 4) were located. The inspection team did not observe the Former Indoor Drummed Waste Storage Area East (SWMU 3) because it was identified as a SWMU based on information received subsequent to the VSI.

The tour concluded at approximately 10:00 a.m., after which the inspection team held an exit meeting with the facility representative. The VSI was completed and the inspection team left the facility at 10:15 a.m.



Photo No.: Orientation: Description: 1 Location: SWMU 2
West Date: November 3, 1992
Former location of the Former Indeed Days made West Storage Arms West located near the

Former location of the Former Indoor Drummed Waste Storage Area West located near the northwest corner of the building.



Photo No.: Orientation: Description: Southeast Date: November 3, 1992
Former location of the Former Outdoor Drummed Waste Storage Area located along the west side of the facility. In 1990, SSS built an addition over the area where the unit was formerly located.

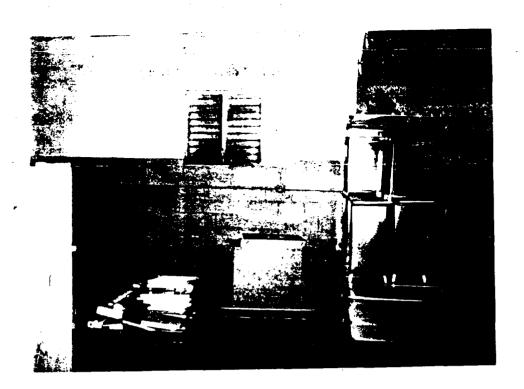


Photo No.: Orientation: Description: 3 East

SWMU 4 Location: Date: November 3, 1992 Former location of the Former Neutralization Tank located along the east side of the building.

### ATTACHMENT C

# VISUAL SITE INSPECTION FIELD NOTES

November 3, 1952

5,4 505u15an Former Liberty - Weather 202

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Call Exercity AT +Plox 10:00 a.m.

#### RIDER

For purposes of this Subpoenh Local's Tecuming of the "shall refer to Suburban Self Storage Facility and any parent, presencessor, successor, subsidiary and filtered or related business entity, present and former officers, directors, agents, accountants, attorney(s), employees, other representatives, and all other persons acting or purporting to act its behalf. The following requests seek documents from 1950 to the present.

- 1. Any and all documents relating to the purchase, transportation, use, storage, or disposal of any chlorinated hydrocarbons, including, but not limited to, tetrachlorethene, tetrachloroethane, trichloroethene, trichloroethane, dichloroethene, dichloroethane, dichloropropene, dichloropropane, vinyl chloride, methylene chloride, and/or chloroform (hereinafter described as "Subject VOCs"), from 1970 to the present. The documents produced in response to this subpoena should include, but not be limited to, test results, manifests, receipts, bills of lading, and agreements, contractual or otherwise. "Document" shall mean every writing and record of every type and description in the company's possession, control, or custody including, but not limited to, correspondence, memoranda, stenographic or handwritten notes, reports, studies, books, pamphlets, laboratory analyses, pictures or voice recordings, or information in electronic form.
- 2. All documents, records, materials including without limitation electronic documents, constituting reflecting or relating to any spills, leakage, overflow, or any other release of any of the Subject VOCs listed in number one above, that occurred at your business and/or on your property.
- 3. Copies of all documents exchanged between you and any state, federal, or local regulatory agency, including without limitation the Illinois Environmental Protection Agency, the Illinois Department of Public Health, the Illinois State Fire Marshall, or the DuPage County Health Department regarding or reflecting any spills, leakage, overflow, or any other release of any Subject VOCs at your property/facility, and/or regarding any violation(s) of environmental laws and/or regulations. Include any attachments that were sent or received with said correspondence.
- 4. Copies of any environmental memoranda, letters, reports, or documents prepared by environmental consultants hired by you or anyone else to perform any environmental investigations at your business and/or on your property, including but not limited to Phase 1 and/or Phase 2 investigations, or any other report relating to environmental conditions your facility.

- 5. Any environmental information relating to your business and/or property provided to any third party, including but not limited to any affiliates, parents, partners, subsidiaries, lenders or other provider or potential providers of paint.
- 6. Copies of any and all documents referring or relating to any and all water well(s) located in, on, or under your property, generated at <u>any time</u> since the well(s) were initially planned/installed, including without limitation, any documents relating to:
  - (a) 'testing of the well(s) for any purpose;
  - (b) well logs;
  - (c) well historical documents;
  - (d) designs, drawings, diagrams, blue prints, and/or construction details of the wells;
  - (e) well maintenance;
  - (f) well pumps;
  - (g) well screens;
  - (h) well water quality;
  - (i) the presence of any contaminants found in water generated by the wells; and
  - (j) the source(s) of any contaminants found in the wells.



# The Green Environmental Croup

Environmeniai Assessments & Consulting

November 14, 1997

Mr. Larry Dolosic, Vice President American National Bank & Trust Company of Chicago 900 75th Street Willowbrook, Illinois 60521

ATTACHMENT 2

Dear Mr. Dolosic:

Attached is a copy of the Phase I Environmental Assessment for the property known as 2333 Wisconsin Avenue, Downers Grove, DuPage County, Illinois. We have personally inspected the property, reviewed records and interviewed knowledgeable people concerning this site. On the basis of observations, record searches and interviews, a Phase II study is recommended for this site.

The subject site was occupied by Liberty Copper & Wire Company, a manufacturer of copper electrical wire from 1960-1986. Liberty Copper was a TSD (transport, storage and disposal) site which went through storage closure for an outdoor waste storage area at the west side of the building and an indoor dock drum storage area at the northeast portion of the building (two out of the four specific areas of concern identified in this report). The subject site was also put on the CERCLIS list as a result of the TSD status.

A 1993 Preliminary Assessment conducted for the USEPA regarding the subject site did not indicate that further soil sampling was necessary for the indoor storage area, although it did not recognize any remedial work done on the site. The Preliminary assessment report recommended possible further closure issues although in reality those issues identified had already been addressed.

The following findings and associated recommendations have been made for this site:

It is recommended that borings be conducted in the building (1990 addition) to a depth of 16 feet to determine if xylene contamination still exists on the property as a result of the

the west side of the property (where the current 1990 building addition is located). 55 gallon drums of waste xylene and other chemicals were stored outside; cracks were noted on the concrete pad. As part of obtaining RCRA closure for the site, soil sampling was conducted in four areas of concern. Soil sampling confirmed that 57,100 ppm of xylene contamination existed in this area. It does not appear that sampling was conducted below two feet. It is recommended that the site be further characterized. Approximately 140 cubic yards of soil were removed (to a depth of two feet) in and around the former waste storage area in July, 1987; confirmatory sampling in and around the excavated area did not indicate the depth of which the confirmatory sampling was conducted. The area was filled in with gravel on October, 1987.

- Portion of the subject building where drum storage of waste xylenes and waste enamels was located. This area was described as being the 675 square feet of space in the front dock area. This area stored waste enamels and waste solvents prior to being shipped offsite to a fuel reblending site. As part of RCRA closure for the site, a chip sample of the concrete floor was taken. Elevated levels of xylene and nickel were detected in the chip sample. The floors were decontaminated and power washed and confirmatory samples did not indicate contamination. An internal memo at the Illinois EPA indicated that photographs indicated staining in this dock area, as well as cracking and a drain which could possibly (according to an Magnetek (successor to Liberty Copper and Wire) memo) be a dry well. No samples underneath the concrete were taken. Regardless of whether the drain is a drywell or floor drain, sampling is recommended.
- It is recommended that samples be taken in the basement area where collection tanks were located and drainage from the upper hazardous material storage area may have drained to. During the site inspection, the basement walls and ceilings were observed be coated with possible metal deposits. It appears that aboveground basement tanks were located in this area which were used to store electroplating waste. It is unclear what other operations

took place in the basement; however, sampling of the deposits on the walls and ceiling would confirm if metals contamination is present. A sample of soil under the basement floor is also recommended. A sump pump located in the northeast corner of the basement may be a potential pathway for contaminants to travel to the soil.

An electromagnetic scan of the subject site is recommended in order to determine if any remaining tanks are located on the subject site. The electromagnetic scan will indicate remaining tanks on the property as well as the former locations of tanks that have been removed. If tanks are still present, they should be removed if possible. Soil borings are recommended to determine if the tanks have leaked product. The subject site has four active underground storage tanks listed with the State Fire Marshal's Office. According to a map in an Illinois EPA file, three of the tanks are: two-4,000 gallon tanks and one-5,000 gallon tank in the western parking lot. However, building permits from the City of Downers Grove indicated that one-6,000 gallon tank and two-5,000 gallon tanks were on the subject site. The fourth tank has not been identified in any documents except the Fire Marshal registration list. There is no documentation for the removal of the four tank listed to the site, although the current owner, Mr. John Sorenson, recalls two tanks being removed from the parking lot when his company was located across the street from this subject building. If the tanks have been properly removed with permits from the Office of the State Fire Marshal, filing of appropriate documentation to change the status to closed is recommended. A heating oil tank may be the possible fourth registered tank; however, a heating oil tank, at the time of the tanks' registration, would not have to be registered. An FOI request with the State Fire Marshal's Office was filed and we are awaiting a response to the request. As soon as any information is gathered, it will be forwarded to you. The Downers Grove Fire Department did not indicate any records in their office for the subject site.

There is one nearby LUST site across Wisconsin Avenue (which is the same owner as the subject building) has received closure with the Illinois EPA and should not pose a threat to the subject site. There are a number of hazardous waste generators, two TRI reporters, two CERCLIS sites

(which inc des the subject site), and two NIPC solid waste site in the vicinity of the subject site, including an immediately adjacent site that use large quantility of chloric and an order. The site immediately to the east could pose a significant threat to the subject property. It is recommended that sampling conducted at the subject site include VOCs, to determine if the use of tetrachloroethylene on the adjacent site is adversely impacting the subject site.

The property may fall under the provisions of the Illinois Responsible Property Transfer Act, if a transfer is made. From the field inspections and interviews with knowledgeable persons, underground tanks subject to registration at the State Fire Marshal's Office may be present. However, hazardous materials are not currently used in quantities which would be subject to reporting under SARA Section 312. The subject site is not within a floodway, or designated floodplain.

True copies of this report are signed and sealed on this page and on page 32 of the report.

Sincerely,

William W. Frerichs, REPA

THE GREEN ENVIRONMENTAL GROUP, LTD.

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-6762

MAR 0 1 1996

Suburban Moving and Storage Attn: James Radlein 2100 Ogden Avenue Lisle, IL 60532

Re:

LPC# 0430305158 -- DuPage County Downers Grove/Suburban Moving and Storage 2400 Wisconsin Avenue Incident #913065 LUST File

Dear Mr. Radlein:

The Illinois Environmental Protection Agency has reviewed the Results of Groundwater Sample Analysis Report and Professional Engineer Certification which were submitted for the above referenced LUST Incident. This information was dated October 9, 1995 and was received by the Agency on October 11, 1995.

Based upon the certification by David G. Yacko, a registered Professional Engineer of Illinois, and based upon other information in the Agency's possession, it appears that the Illinois Environmental Protection Agency will not require any further remediation with regard to the above referenced LUST Incident.

This letter does not constitute Agency approval of any costs incurred during remediation, nor does this letter constitute Agency approval of any corrective action activities performed during remediation.

Should you have any questions or need further assistance, do not hesitate to contact Dianne Potter-Byron of my staff at 217/782-6762.

Sincerely,

Hernando A. Albarracin

Unit Manager

Leaking Underground Storage Tank Section

Hernando A. Albarrain.

Division of Remediation Management

Bureau of Land

ce: David Yacko

ATTACHMENT 3



ENVIRONMENTAL SERVICES, INC. CONSULTING ENGINEERS

December 9, 1994

Phone: (708) 460-6912 FAX: (708) 460-6925

Mr. Bur Filson, Manager Illinois Environmental Protection Agency Bureau of Land Division of Remediation Management Leaking Underground Storage Tank Section 2200 Churchill Road, P.O. Box 19276 Springfield, Illinois 62794-9276

Subject:

Results of Groundwater Monitoring Well Installation, Sampling, and Analysis;

SITE 91121T01.M34

Reference:

LPC #0430305158 -- DuPage County

Downers Grove/Suburban Moving and Storage

2400 Wisconsin Avenue

Incident #913065

LUST/Tech Report File

#### Dear Mr. Filson:

SITE Environmental Services, Inc. (SITE), on behalf of Suburban Moving and Storage Company (Suburban Moving), is pleased to present the results (attached) of groundwater monitoring well installation, sampling, and analysis performed in October and November 1994, following verbal approval from Ms. Dianne Potter (IEPA) on October 19, 1994, to proceed. Specifically, the approved work undertaken that was agreed sufficient at this time to address Agency concerns presented in their September 12, 1994, letter consisted of the following:

- install downgradient groundwater monitoring wells MW4 and MW5 at the locations shown in the figure in Appendix 1;
- sample all groundwater monitoring wells (MW1-MW5) for PNAs and total lead analysis;
- report the results of this round of groundwater analysis.

Monitoring wells MW1 through MW3 had been installed during prior investigation events. Downgradient wells MW4 and MW5 were installed on October 24, 1994, by Chicago Drilling Company. Split spoon soil samples were obtained at 2.5-foot intervals, and all soil samples were screened for total volatile organic compounds (VOCs) using a Photovac Microtip photoionization detector (PID) by placing a small portion of each sample in a plastic ziplock bag, warming the

Mr. Bur Filson Incident 913065 SITE 91121T01.M34 December 9, 1994

sample to volatilize any VOCs which may be present, and inserting the tip of the PID into a been recorded on the boring logs for MW4 and MW5, which are included in Appendix 2 soil samples in either MW4 or MW5.

One soil sample was retained from each boring for laboratory analysis of PNAs and TCLP Lead. Results are presented in the attached summary table. PNAs were not detected in either of the detected at the low concentration of 0.026 ppm in the soil sample analyzed from MW4, but was cleanup validation samples of the excavation surfaces situated between the former USTs and the

Monitoring wells MW4 and MW5 were installed to a depth of 15 feet each, with each consisting of a 10-foot long stainless steel screen and PVC riser. Well construction details are shown in boring logs in Appendix 2, groundwater was measured at a depth of about 3.5 feet at upgradient of a feet after 18 days. Groundwater flow was determined to be west of northwest.

Monitoring wells MW1, 2, 3, and 5 were sampled on October 24, 1994, for PNA analysis sampled for PNAs, and all five monitoring wells were sampled for total lead analysis shown in the attached table, PNAs were not detected in any of the groundwater samples. As which is not considered to be LUST-related since lead contamination was not evident in cleanup monitoring well locations.

MW4 was a sufficient quantity of water in MW4 for sampling. As which is not considered to be LUST-related since lead contamination was not evident in cleanup monitoring well locations.

Based on the groundwater monitoring results presented herein and in previous submittals, it is PNAs have not migrated beyond this area. Further evaluation of this site is unwarranted, and that Agency is requested to grant Suburban Moving & Storage Company Incident 913065 closure.

16

Mr. Bur Filson Incident 913065 SITE 91121T01.M34 December 9, 1994

If you have any questions please do not hesitate to call me.

Sincerely,

David G. Yacko, P.

President

attachment: Summary of Monitoring Well Sample Analyses

appendices: Appendix 1 - Groundwater Monitoring Well Locations and Details

Appendix 2 - Soil Boring Logs and Field Reports

Appendix 3 - Laboratory Certification and Data Sheets

cc: Mr. James Radlein (Suburban Moving and Storage)

Suburban Moving & Storage IEMR Incident 913065 11/30/94

#### SUMMARY OF MONITORING HELL SAMPLE ANALYSES

		Para	[3]					
		Non-C	arcinogen	ic PNAs			Total Other	
Sample	Naphtha- lene	Acenaph- thene	Pyrene	Non-Carc. PNAs	TCLP Lead			
IEPA Soil Cleanup Objective [1]	0.025	8.400	42.000	5.600	5.600	4.200	4.200	0.0075
PQL [2]	0.66	1.2	0.66	0.66	0.14	0.18	1.371	0.005
ИН4-5 (11.0'-12.0' ИН5-4 (0.8'-9.8')	> ND ND		ND ND	ND ND		ND ND		ND 0.026
Groundwater PQLs[2	3 0.010	0.018	0.0066	0.0021	0.0021	0.0027	0.01716	,
Groundwater Sample 1141 1142 1143 1144 1144 1145	s: ND ND ND ND	ND ND	ND ND ND ND	ND ND ND ND	ND ND ND	ND ND ND ND	ND ND ND	ND ND ND 0.014 ND

<sup>[5]</sup> [1]

IEPR "Leaking Underground Storage Yank Manual", Fall 1991; objectives revised February 1993. PQL = Practical Quantitation Limit; values shown for PNRs are IEPR-specified detection levels. Total Other Non-Carcinogenic PNRs include: Acenaphthylene, Benzo(g,h,i)perylene, Phenanthrene P = neets the greater of all IEPR generic cleanup objectives or PQLs. X = enceeds the greater of one or nore IEPR generic cleanup objective or PQL. [3] [4]

Suburban Moving & Storage IEMA Incident 913065 11/30/94

#### SUMMARY OF MONITORING WELL SAMPLE ANALYSES (cont.)

			Paranet	er (concentrati	on in ppH)			[4]
				Carcinogenic P	NRs	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	~~~~~~~~	
Sample	Benzo(a) anthracene	Benzo(a) pyrene	Benzo(b) fluoranthene	Benzo(k) fluoranthene	Chrysene	Dibenzo(a,h) anthracene	Ideno(1,2,3 -cd)pyrene	P/x
IEPA Soil Cleanup Objective [1]	0.0026	0.0046	0.0036	0.0034	0.03	0.006	0.0086	
PQL [2]	0.0087	0.015	0.011	0.011	0.10	0.020	0.029	
МИ4-5 (11.0'-12.0') НИ5-4 (8.8'-3.8')	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND	P ¥
Groundwater PQLs[2]	0.00013	0.00023	0.00018	0.00017	0.0015	0.00030	0.00043	
Groundwater Samples: MW1 MW2 MW3 MW4 MW5	ND ND ND ND ND	ND ND ND ND ND	ND ND ND ND	ND ND ND ND NO	ND ND ND ND ND	ND ND ND NO ND	ND ND ND ND ND	P P X P

IEPR "Leaking Underground Storage Tank Manual", Fall 1991; objectives revised February 1993. PQL = Practical Quantitation Limit; values shown for PNRs are IEPR-specified detection levels. Total Other Non-Carcinogenic PNRs include: Acenaphthylene, Benzo(g,h,i)perylene, Phenanthrene P = neets the greater of all IEPR generic cleanup objectives or PQLs. X = exceeds the greater of one or more IEPR generic cleanup objective or PQL. [1]

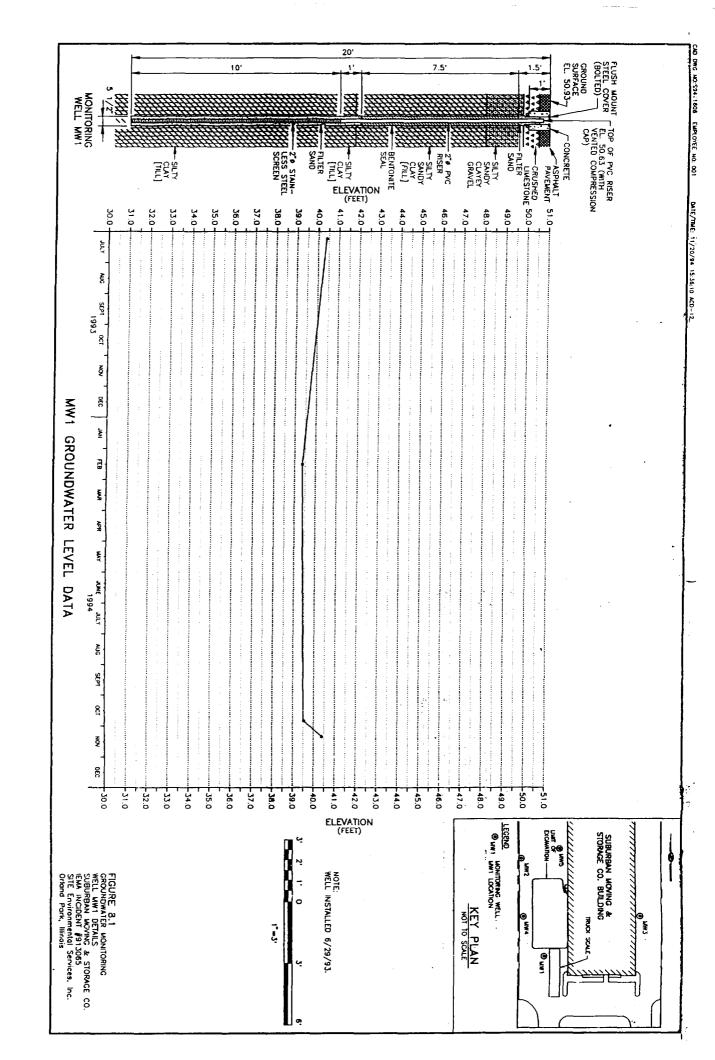
<sup>[3]</sup> 

<sup>[4]</sup> 

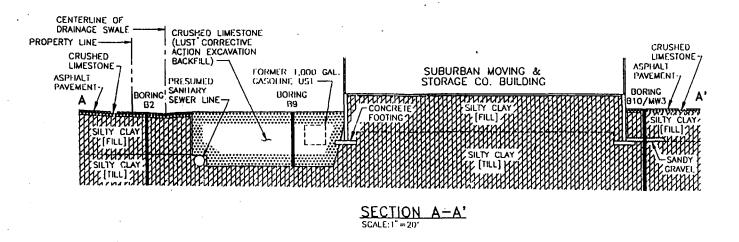
Mr. Bur Filson Incident 913065 SITE 91121T01.M34 December 9, 1994

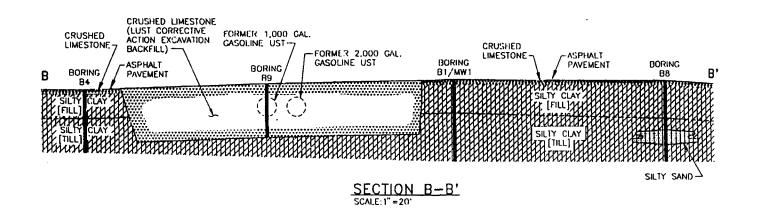
#### APPENDIX 1

GROUNDWATER MONITORING WELL LOCATIONS AND DETAILS



Orland Park, Illinois





#### NOTES:

1. SEE FIGURE 7 FOR GEOLOGIC SECTION LOCATIONS.

2. INTERPRETATION OF STATIGRAPHY BASED ON BORING LOGS, AND MAY DIFFER FROM THIS DEPICTION.

20' 40

=20'

FIGURE 9
CEOLOGIC SECTIONS
SUBURBAN MOVING & STORAGE CO.
DOWNERS GROVE, ILLINOIS
IEMA INCIDENT #913065
SITE Environmental Services, Inc.
Orland Park, Illinois

Mr. Bur Filson Incident 913065 SITE 91121T01.M34 December 9, 1994

# APPENDIX 2 SOIL BORING LOGS AND FIELD REPORTS

# SOIL BORING LOG

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### SITE Environmental Services, Inc. 15320 Stradford Lane Orland Park, Illinois 60462

Phone: 708-460-6912 Fax: 708-460-6925

#### FIELD REPORT

October 24, 1994

Project: Suburban Moving & Storage

Project #91121T01

Present: David Yacko (SITE), Mike and Gabriel Shlimon (Chicago Drilling Company-

CDC)

Weather: Partly sunny, cold, strong southerly wind; brief drizzle before noon;

temperature: 50°F @ noon

CDC shown the IEPA-approved locations for MW4 and MW5. MW4 was attempted first since it is located in an area where employees could park if delayed until last. Three trials were required before completing the boring. Trial 1 encountered brown crushed stone (max. dia. approx. 1") to a depth of 10 feet. The material was fill, possibly used in conjunction with the sewer installation. Drilling was difficult, and the boring was abandoned and relocated 5 feet to the north. Similar conditions were again encountered, and a hard, impenetrable object encountered at 15 feet. Trial 2 was abandoned, and MW4 relocated about 8 feet south of Trial 2, and completed to a total depth of 20 feet in search of obvious groundwater. Based on the water levels at MW1 (11') and MW2 (9') today, the well was final installed to a depth of 15 feet in Trial 3.

A hard impenetrable object was encountered at MW5 at a depth of about 5.5 feet. The boring was relocated about 2' northwest, and drilled to a depth of 15 feet. GW5 was installed to a depth of 15'.

Both wells were constructed with a 10-foot stainless steel screen and PVC riser. Low-level VOCs were detected in the uppermost sample in each boring, but no VOCs were detected below a depth of 2.5 feet. One soil sample was obtained from each of MW4 and MW5. Groundwater samples MW1,2,3, and 5 were obtained today, and the top of riser pipe and surrounding groundsurface at MW4 and MW5 was surveyed following well installation. MW4 had not produced enough groundwater for measurement or sampling today, and SITE.

Field Report 10/24/94 91121T01

intends to return in about 48 hours to measure and sample the well.

Quality Analytical Labs picked up all samples obtained today at about 3:15 pm for transport back to the laboratory.

## SITE Environmental Services, Inc. 15320 Stradford Lane Orland Park, Illinois 60462

Phone: 708-460-6912 Fax: 708-460-6925

### FIELD REPORT

November 7, 1994

Project: Suburban Moving & Storage

Project #91121T01

Present: David Yacko (SITE)

Stopped by Suburban site after tank removal at Jungels Heating in Lisle. Checked MW4; water starting to accumulate at the bottom of the well but still not enough to sample.

### SITE Environmental Services, Inc. 15320 Stradford Lane Orland Park, Illinois 60462

Phone: 708-460-6912 Fax: 708-460-6925

#### FIELD REPORT

November 11, 1994

Project: Suburban Moving & Storage Project #91121T01

Present:

David Yacko (SITE)

Measured all wells, beginning with MW4. Finally some water had accumulated in MW4 (about 1-foot). Because of the very slow rate of recharge to this well, it would not be possible to bail three well volumes prior to sampling; Therefore, the water that was in the well was sampled for the required PNA and total Lead analyses. Only about 1/3 gallon of water could be sampled for PNAs; about 8 ounces of water were sampled for total lead. The well was completely dry upon completion of sampling, and while sampling the other wells was allowed to recharge, if possible. No measurable or samplable accumulation was evident, and the well was closed. Wells MW1,2,3, and 5 have already been analyzed by QAL for PNAs, and therefore were only sampled for total lead analysis.

The PNA sample from MW4 was taken to QAL; Mike Kimmel of QAL believed the quantity would be very marginal for analysis to the ADLs prescribed by the IEPA. However, in light of the fact that it could take months before there is enough water to fill a gallon container, the sample was turned over to QAL for analysis to do the best they could at analyzing the sample to the Agency specified ADLs.

Total Lead samples were left at the site (Burnside) for pickup by Great Lakes Analytical. Lead samples would not be analyzed by QAL since they currently do not have anyone inhouse who can run the analysis, and have been subcontracting the metals testing to other laboratories who we do not wish doing our analyses, particularly because of an apparent lack of communication between QAL and these other labs. Therefore, until QAL can perform metals analyses in-house, samples will be analyzed by either Great Lakes Analytical or Environmental Monitoring and Technologies, Inc.

Mr. Bur Filson Incident 913065 SITE 91121T01.M34 December 9, 1994

#### **APPENDIX 3**

LAB CERTIFICATION AND DATA SHEETS

# Illinois Environmental Protection Agency

Suburban Moving LEAKING UNDERGROUND STORAGE TANK PROGRAM Chain-of-Custody #19433 Laboratory Certification 3 #19437

rt A - Sample Collector

	$\sim 4.1$
I was responsible for sample collection. I certify that samples were collected using approved USEPA.	or IEPAprocedures.
	(Initial)
I certify that chain of custody procedures were followed in the field, that efforts were made to preserve	sample integrity and that
all samples were properly labeled.	131
	(Initial)
t B - Laboratory Representative	il i
I certify that proper chain of custody procedures were followed as documented on the chain of custody	
	(Initial)
I certify that sample integrity was maintained by proper preservation, and that all samples were labeled	
	(Initial)
I certify that quality assurance/quality control procedures were established and carried out.	(Initial)
I certify that sample holding times were not exceeded.	
Teamy mai sample holding times were not exceeded.	(Initial)
I certify that SW-846 Analytical Laboratory Procedure (USEPA) methods were used for the analysis.	$\mathcal{W}$
	(Initial)
I certify that the lowest practicable quantitation limit found in SW-846 for soils and groundwater were	met for each parameter.
	(Initial)
by affirm that all information contained in this form is true and accurate to the best of my knowledge a	and belief. I am aware that

are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing viola-

PLE COLLECTOR	LABORATORY /
n _ David G. Yacko	Name: Alle Alamet
President	Title: Phoject Minocopy
pany: SITE Environmental Services, Inc.	Company; Quality Analytical Labs, Inc.
ss: Orland Park, IL 60462-6741	Address: Lisle, IL 60532
we: Lavid 4- Mecho	Signature:
11/16/94	Date: 1/123/94
	7.70

denuire this information under 415 to CS 5/4 and 2 to inschoome of this information is required. White to decise to be a country a civil to up to \$25,240,00 fix to in day the failure postinues, a fine up to \$50,000 00 and imprisonment up to five years. This for notice approved by the Forms



November 10, 1994

SITE Environmental Services 15320 Stradford Lane Orland Park, IL 60462

ATTN: David Yacko

Chain of Custody #: QAL #19433

Project Name & #: Suburban Moving & Storage

2400 Wisconsin Avenue

Downers Grove, IL Proj. #91121T01

Sampling Date: 10/24/94

Please find enclosed the Analytical Report for the following samples:

QAL Lab ID #	Sample Description
942450-01	MW4-5, MW4 @ 11.0'-12.0'
942450-02	MW5-4, MW5 @ 8.8'-9.8'
942450-03	MW2, Monitoring Well MW2
942450-04	MW1, Monitoring Well MW1
942450-05	MW3, Monitoring Well MW3
942450-06	MW5, Monitoring Well MW5
342430-00	MMS, MONITCOTTING MOTI MMS

If you have any questions please contact Mike Kimmel at our laboratories.

Respectfully submitted,

Quality Analytical Laboratories, Inc.

John Boudreau
Laboratory Director

sy:SI942450

Quality Analytical Laboratories, Inc. Project #942450 Page 2 of 7

#### Sample ID: MW4-5, 942450-1

<pre>% Moisture: 13 Extraction Date: 10/27/94 PNA'S</pre>	Analysis Date: Method: SW-84	
Parameter	CRDL mg/Kg	Analysis mg/Kg
Naphthalene Acenaphthylene Acenaphthene Fluorene Phenanthrene Anthracene Fluoranthene	0.66 0.66 1.2 0.14 0.66 0.66	U U U U
Pyrene Benzo(a) anthracene Chrysene Benzo(b) fluoranthene Benzo(k) fluoranthene Benzo(a) pyrene Dibenzo(a,h) anthracene Benzo(ghi) perylene Indeno(1,2,3-c,d) pyrene	0.18 0.0087 0.10 0.011 0.011 0.015 0.020 0.051 0.029	ט ט ט ט ט ט ט

TCLP Extraction Date: 10/26/94 Digestion Date: 10/31/94 TCLP METAL (select)

Parameter	PQL	Analysis	Method	Analysis
	mg/L	mg/L	SW846	Date
TCLP Lead	0.005	U ·	7421	11/02/94

Quality Analytical Laboratories, Inc. Project #942450 Page 3 of 7

#### Sample ID: MW5-4, 942450-2

6	MOI	.st	ure:	: 1	6
777-			٠	D-+	

Extraction Date: 10/27/94 PNA'S	Analysis Date: Method: SW-84	
Parameter	CRDL mg/Kg	Analysis mg/Kg
Naphthalene Acenaphthylene Acenaphthene Fluorene Phenanthrene Anthracene Fluoranthene Pyrene Benzo(a) anthracene Chrysene Benzo(b) fluoranthene Benzo(k) fluoranthene	0.66 0.66 1.2 0.14 0.66 0.66 0.66 0.18 0.0087 0.10 0.011	ט ט ט ט ט ט ט ט
Benzo(a) pyrene Dibenzo(a,h) anthracene Benzo(ghi) perylene Indeno(1,2,3-c,d) pyrene	0.015 0.020 0.051 0.029	บ บ บ

TCLP Extraction Date: 10/26/94

Digestion Date: 10/31/94
TCLP METAL (select)

Parameter	PQL	Analysis	Method	Analysis		
	mg/L	mg/L	SW846	Date		
TCLP Lead	0.005	0.026	7421	11/02/94		

Quality Analytical Laboratories, Inc. Project #942450 Page 4 of 7

#### Sample ID: MW2, 942450-03

Extraction Date: 10 PNA'S Parameter	0/31/94		Date: 11/03/94 SW-846 8310 Analysis ug/L
Naphthalene		10.	U
Acenaphthylene		10.	U
Acenaphthene		18.	U
Fluorene		2.1	U
Phenanthrene		6.4	ប
Anthracene		6.6	Ŭ
Fluoranthene		2.1	ប
Pyrene		2.7	U
Benzo(a)anthracene		0.13	U
Chrysene		1.5	U
Benzo(b) fluoranthene	9	0.18	U
Benzo(k) fluoranthene	3	0.17	Ŭ
Benzo(a)pyrene		0.23	· U
Dibenzo(a,h)anthrace	ene	0.30	U
Benzo(ghi)perylene		0.76	U
Indeno(1,2,3-c,d)py	rene	0.43	U

Quality Analytical Laboratories, Inc. Project #942450 Page 5 of 7

### Sample ID: MW1, 942450-04

Extraction Date: PNA'S Parameter	10/31/94	Analysis Method: CRDL ug/L	SW-846	
Naphthalene		10.	τ	J
Acenaphthylene		10.	J	J
Acenaphthene		18.	Ţ	J
Fluorene		2.1	Ţ	J
Phenanthrene		6.4	Ţ	J
Anthracene		6.6	τ	J
Fluoranthene		2.1	τ	J
?yrene		2.7	τ	Ţ
Benzo (a) anthracene	<b>:</b>	0.13	τ	Ţ
Chrysene		1.5	Ü	Ţ
3enzo(b)fluoranthe		0.18	τ	ī
<pre>3enzo(k) fluoranthe</pre>	ene	0.17	Ü	•
3enzo(a)pyrene		0.23	τ	· '
Dibenzo(a,h)anthra		0.30	τ	Ţ
3enzo(ghi)perylene		0.76	Ü	ī
Indeno(1,2,3-c,d)p	yrene	0.43	U	Ţ

Quality Analytical Laboratories, Inc. Project #942450 Page 6 of 7

#### Sample ID: MW3, 942450-05

Extraction Date: 10/31/94 PNA'S Parameter		Date: 11/03/94 <b>SW-846 8310</b> Analysis ug/L
Naphthalene	10.	Ū
Acenaphthylene	10.	Ŭ
Acenaphthene	18.	Ŭ
Fluorene	2.1	Ŭ
Phenanthrene	6.4	Ŭ
Anthracene	6.6	Ŭ
Fluoranthene	2.1	Ŭ
Pyrene	2.7	U
Benzo(a)anthracene	0.13	Ŭ
Chrysene .	1.5	Ŭ
Benzo(b)fluoranthene	0.18	U
Benzo(k)fluoranthene	0.17	Ŭ
Benzo(a)pyrene	0.23	ប
Dibenzo(a,h)anthracene	0.30	ប
Benzo(ghi)perylene	0.76	Ŭ
Indeno(1,2,3-c,d)pyrene	0.43	Ŭ

Quality Analytical Laboratories, Inc. Project #942450 Page 7 of 7

#### Sample ID: MW5, 942450-06

PNA'S Parameter		Date: 11/03/94 SW-846 8310 Analysis ug/L
Naphthalene	10.	Ū
Acenaphthylene	10.	Ū
Acenaphthene	18.	Ū
Fluorene	2.1	U
Phenanthrene	6.4	U
Anthracene	6.6	U
Fluoranthene	2.1	U
Pyrene	2.7	U
Benzo(a)anthracene	0.13	U
Chrysene	1.5	Ū
Benzo(b) fluoranthene	0.18	Ŭ
Benzo(k)fluoranthene	0.17	Ū
Benzo(a)pyrene	0.23	U
Dibenzo(a,h)anthracene	0.30	Ū
Benzo(ghi)perylene	0.76	Ŭ
Indeno(1,2,3-c,d)pyrene	0.43	U

## EPA - Defined Data Qualifiers

- B Compound detected in blank (Normalized concentration)
  - Used when blank value exceeds half of the CROL (PQL).
- C Pesticide result confirmed by GC/MSD
- D Compound identified in analysis at a secondary dilution factor
  - Used when two or more dilutions of a sample are needed to acquire valid data.
- E Compounds concentration exceeds calibration range
  - Used when upper level of calibration curve is exceeded by 10%. Analyses greater than 50% of upper calibration level are reanalyzed at a higher dilution.
- J Estimated value. Compound detected below the CRDL (PQL).
- P Pesticide or Aroclor analysis where results between analytical and confirmation columns is > 25%.
- U Compound analyzed for but not detected at or above the CRDL (PQL).
- X NON-Specific flag See definition at the end of the report

## Data Validation Qualifiers

- NJ Presumptive evidence of presence of material at an estimated quantity.
  - Used when QA/QC failures are present AND data is true. Must be accompanied by NCR
- PND Precision Not Determined
  - Used when non-approved methods are used to obtain data.
  - R Reported value is unusable due to gross QA/QC deficiencies.
- RND Recovery Not Determined
  - Used when non-approved methods are used to obtain data.
- UJ Compound analyzed for but not detected, reported detection limit estimated because QA/QC criteria were not met.

## Detection Limit Definitions

- CRDL Contract Required Detection Limits = Detection limits specified by client or agency
  - Based on wet weight analysis
- IDL Instrument Detection Limit
  - Statistically derived detection limit from 7 + analyses of a low level standard near but above the estimated Method Detection Limit.
- MDL Method Detection Limit
  - Instrument Detection Limit X End Volume (specified by the method). ... Mass, Volume or Area of the Sample (specified by the method) (Based on wet weight analysis)
- PQL Practical Quantitation Limit
  - Method Detection Limit | X | End Volume (analytical) / Mass, Volume or Area of the Sample (analytical) (Based on wet weight analysis)

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November 22, 1994

SITE Environmental Services 15320 Stradford Lane Orland Park, IL 60462

ATTN: David Yacko

Chain of Custody #: QAL #19437

Project Name & #: Suburban Moving & Storage; #91121T01

Sampling Date: 11/11/94

Please find enclosed the Analytical Report for the following sample:

OAL Lab ID # Sample Description

942671-01 MW4, Monitoring Well

If you have any questions please contact Mike Kimmel at our laboratories.

Respectfully submitted,

Quality Analytical Laboratories, Inc.

John Boudreau

Laboratory Director

sv:91943671

Quality Analytical Laboratories, Inc. Project #942671 Page 2 of 2

#### Sample ID: MW4, 942671-01

Extraction Date: 11/16/9 PNA'S Parameter	94	Analysis Method: CRDL ug/L	SW-846	11/17/94 <b>8310</b> Analysis ug/L
Naphthalene		10.		U
Acenaphthylene	_	10.		U
Acenaphthene		18.		บ
Fluorene		2.1	•	U
Phenanthrene		6.4	•	Ū
Anthracene		6.6	•	Ū
Fluoranthene	. =	2.1	•	U
Pyrene		2.7	•	Ω ·
Benzo(a)anthracene		0.13		U
Chrysene		1.5		U
Benzo(b)fluoranthene		0.18		U
Benzo(k)fluoranthene	-	0.17		U
Benzo(a)pyrene		0.23		
Dibenzo(a,h)anthracene		0.30		Ŭ
Benzo(ghi)perylene		0.76		Ū
Indeno(1,2,3-c,d)pyrene		0.43		ט

EPA - Defined	Data	Qualifiers
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В Compound detected in blank (Normalized concentration)

Used when blank value exceeds half of the CRDL (PQL).

- С Pesticide result confirmed by GC/MSD
- D Compound identified in analysis at a secondary dilution factor

Used when two or more dilutions of a sample are needed to acquire valid data.

F Compounds concentration exceeds calibration range

> Used when upper level of calibration curve is exceeded by 10%. Analyses greater than 50% of upper calibration level are reanalyzed at a higher dilution.

- Estimated value. Compound detected below the CRDL (PQL).
- Pesticide or Aroclor analysis where results between analytical and confirmation columns is > 25%.
- Compound analyzed for but not detected at or above the CRDL (PQL).
- NON-Specific flag See definition at the end of the report Х

## Data Validation Qualifiers

NJ Presumptive evidence of presence of material at an estimated quantity.

Used when QA/QC failures are present AND data is true. Must be accompanied by NCR

**PND** Precision Not Determined

Used when non-approved methods are used to obtain data.

- R Reported value is unusable due to gross QA/QC deficiencies.
- RND Recovery Not Determined

Used when non-approved methods are used to obtain data.

UJ Compound analyzed for but not detected, reported detection limit estimated because QA/QC criteria were not met.

## Detection Limit Definitions

Contract Required Detection Limits = Detection limits specified by client or agency CRDL

Based on wet weight analysis

IDL Instrument Detection Limit

Statistically derived detection limit from 7 + analyses of a low level standard near but above the estimated Method Detection

MDL

Method Detection Limit

Instrument Detection Limit - X - End. Volume (specified by the method) - Mass, Volume or Area of the Sample (specified by the method) (Based on wet weight analysis)

PQL Practical Quantitation Limit

Method Detection Limit X End Volume [analytical] / Mass, Volume or Area of the Sample [analytical] (Based on wat weight |

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# Illinois Environmental Protection Agencia. LEASUNG UNDERGROUND STORAGE TANK POO

Part A - Sample Collector

all samples were properly labeled.

1.	I was responsible	for sample coll	lection. Presunty	ប៉ាន់ samples were (	collected using approve	ed USEPA or IEPA g	of thres
		٠٠ .		•		·	(Initial)
٥.	I certify that chait	י טן בווגנטקה אנג	ocedur's were fo	Noved in the field.	that efforts were made	to preserve sample in	MERRICY and the

Pa	rt B. Laboratory Representative		
t.	I certify that proper chain of custody procedures were followed as documented on the chain of custo		Z
		(In	itial)
2.	I certify that sample integrity was maintained by proper preservation, and that all samples were labe		<u></u>
3.	I certify that quality assurance/quality control procedures were established and carried out.		itial)
4.	I certify that sample holding times were not exceeded.	- 06	itial)
			itial).
5.	I certify that SW-846 Analytical Laboratory Procedure (USEPA) methods were used for the analysis	. (Ini	idai)
6.	I certify that the lowest practicable quantitation limit found in SW-846 for soils and groundwater we	re met for each	parameter.

I hereby affirm that all information contained in this form is true and accurate to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SAMPLE COLLECTOR	- ALABORATORI
Name: David G. Yacko	Name: KEVIN W KEELEY
Tide: President	Tile: LABORATORY DIRECTOR
Company: SITE Environmental Services, Inc.	Company: GREAT LAKES ANALYTICAL
Addres: 15320 Stradford Lane	Address: 1380 BUSEH PKWY
reland Park, IL 60462	BUEFALO GROVE, IL 60089
Signature: Havil Jallo	Signature:
Date: 12/5/94	Date: 12.5.94

SAMPLE NUMBER: 4110596-600

(Initial)



No -- "bar": / 1994

Site Environme: al Services, inc.

15320 Stradford Lane
Orland Park, IL 60461-6741
Attention: David Yacko

Project: 91121TO1, Suburban Moving

Enclosed are the results from 5 water samples received at Great Lakes Analytical on November 11, 1994. The requested analyses are listed below:

SAMPLE #	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
4110596	Water, MW1	11/11/94	Lead by EPA 3010/7421
4:10597	Water, MW2	11/11/94	Lead by EPA 3010/7421
4110598	Water, MW3	11/11/94	Lead by EPA 3010/7421
4110599	Water, MW4	11/11/94	Lead by EPA 3010/7421
4110600	Water, MW5	11/11/94	Lead by EPA 3010/7421

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Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANTALYTICAL

Kwin W. Keeley Laboratory Director



Site Environmenta Gervices, inc.

15320 Stradford Lane

Orland Park, IL 60461-6741 Attention: David Yacko

Client Project ID: 91121TO1, Suburban Moving

Sample Descript: Water

Analysis for:

Lead by EPA 3010/7421

First Sample #:

411-0596

Sall pled:

Nov 11, 1994

Received:

Nov 11, 1994

Analyzed:

Nov 15, 1994

Nov 17, 1994 Reported:

#### L'ABORATORY ANALYSIS FOR:

#### Lead by EPA 3010/7421

Sample Number	Sample Description	<b>Detection Limit</b> mg/L	Sample Result mg/L
411-0596	MW1	0.0050	N.D.
411-0597	MW2	0.0050	N.D.
411-0598	мwз	0.0050	N.D.
411-0599	MW4	0.0050	0.014
411-0600	MW5	0.0050	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKE

gwin ₩. Keeley aboratory Director 4110596.SIT <1>



Site Environmental Services, Inc.

15320 Stradford Lane

Orland Park, IL 60461-6741

Attention: David Yacko

Client Project ID: 91121TO1, Suburban Moving

Matrix: Water

QC Sample Group: 4110596-600

Reported: Nov 17, 1994

#### **QUALITY CONTROL DATA REPORT**

**ANALYTE** 

Lead

Method: -

3010/7421

Analyst: Concentration: A. Mehrabi

1.0

Units:

mg/L

LAB. CONTROL SAMPLE DATA

Date Analyzed:

Nov 15, 1994

Instrument I.D.#

LCS%

Recovery:

82

**MATRIX SPIKE** & DUP. DATA

Date Analyzed:

Nov 15, 1994

Instrument I.D.#

**Matrix Spike** 

% Recovery:

90

**Matrix Spike Duplicate %** 

Recovery:

91

Relative %

Difference:

1.1

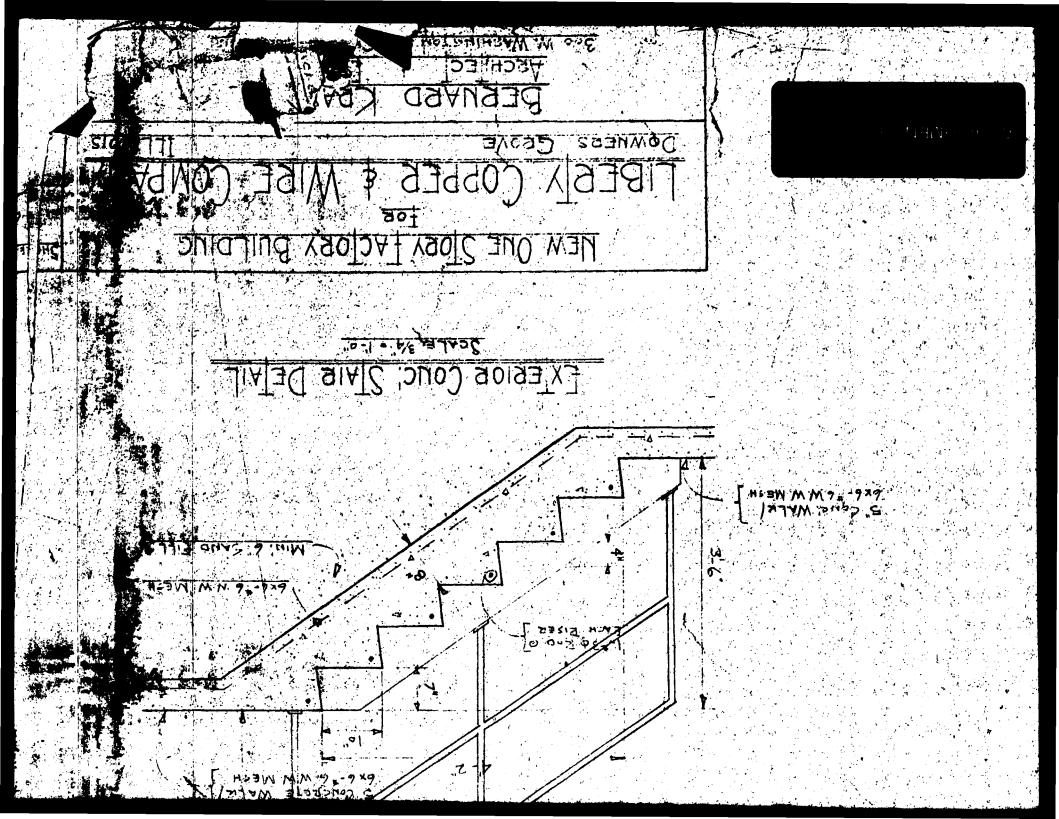
Conc. of M.S. - Conc. of Sample x 100 % Recovery: Spike Conc. Added

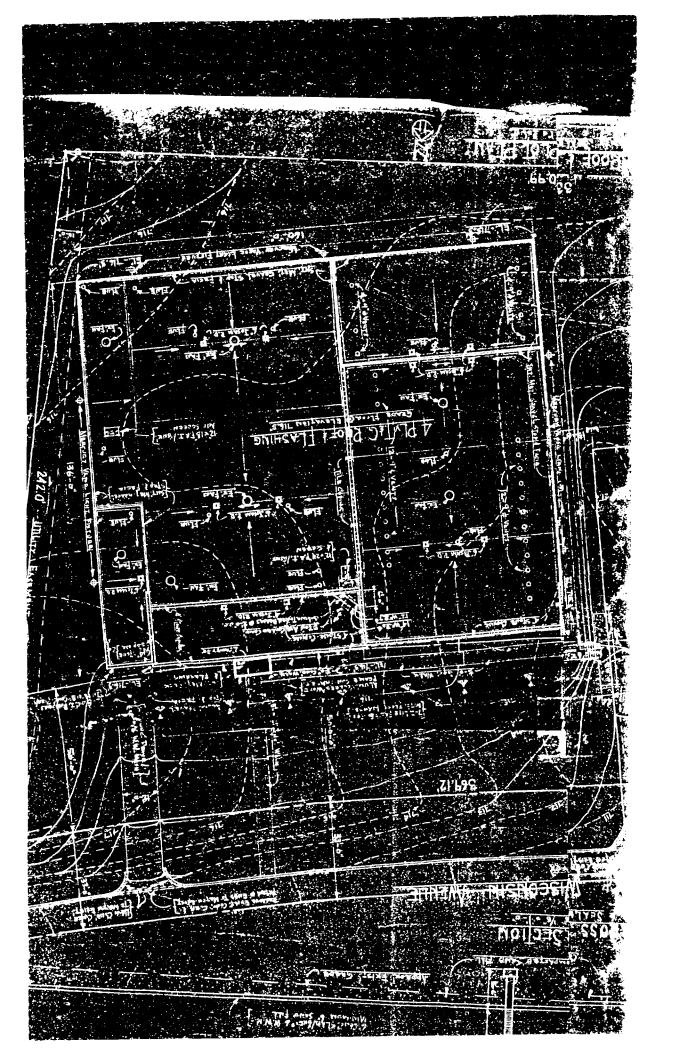
Relative % Difference:

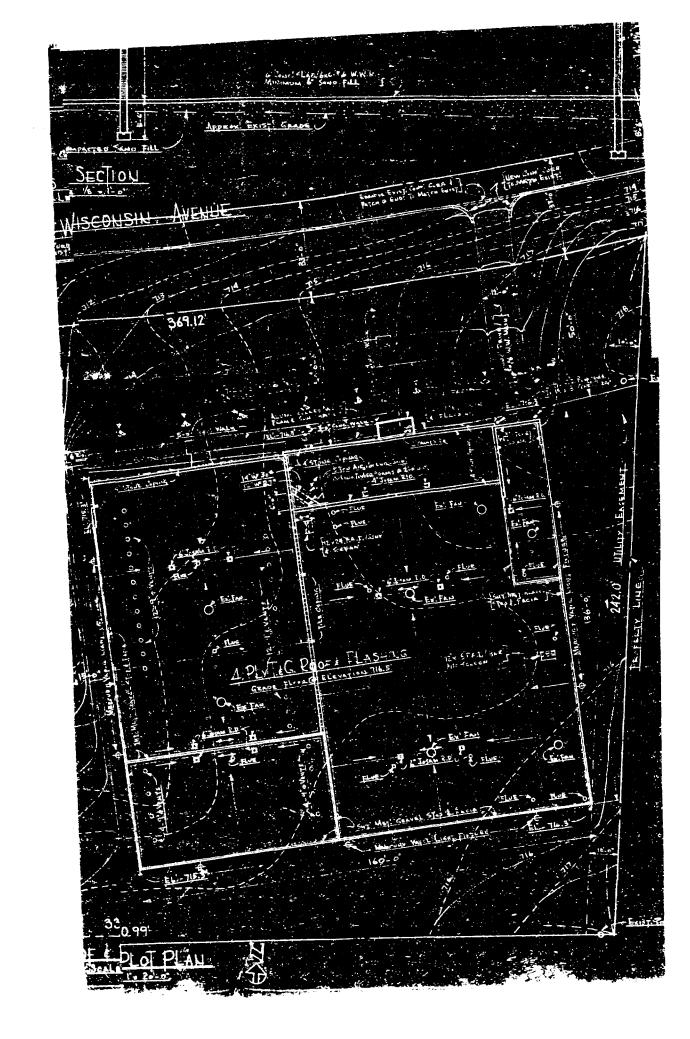
Conc. of M.S. - Conc. of M.S.D. (Conc. of M.S. + Conc. of M.S.D.) / 2 x 100

4110596.SIT

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ROOF & PLOT PLANS

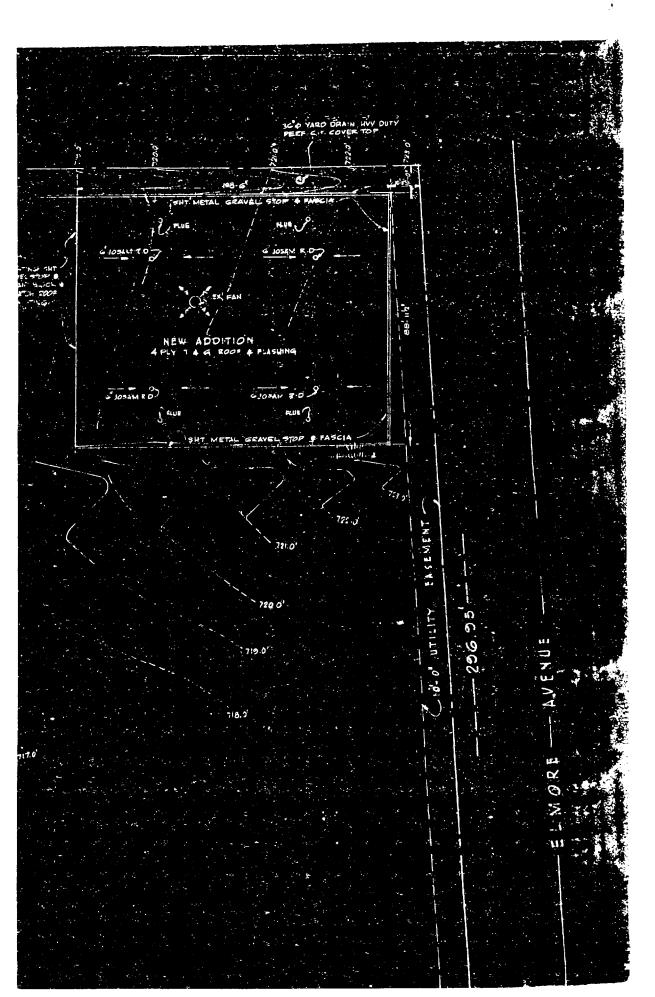
ADDITION TO EXISTING BUILDING CONSIN & JANES LY WISE

BERNARD KRAUSS

ARCHITECT - ENGINES

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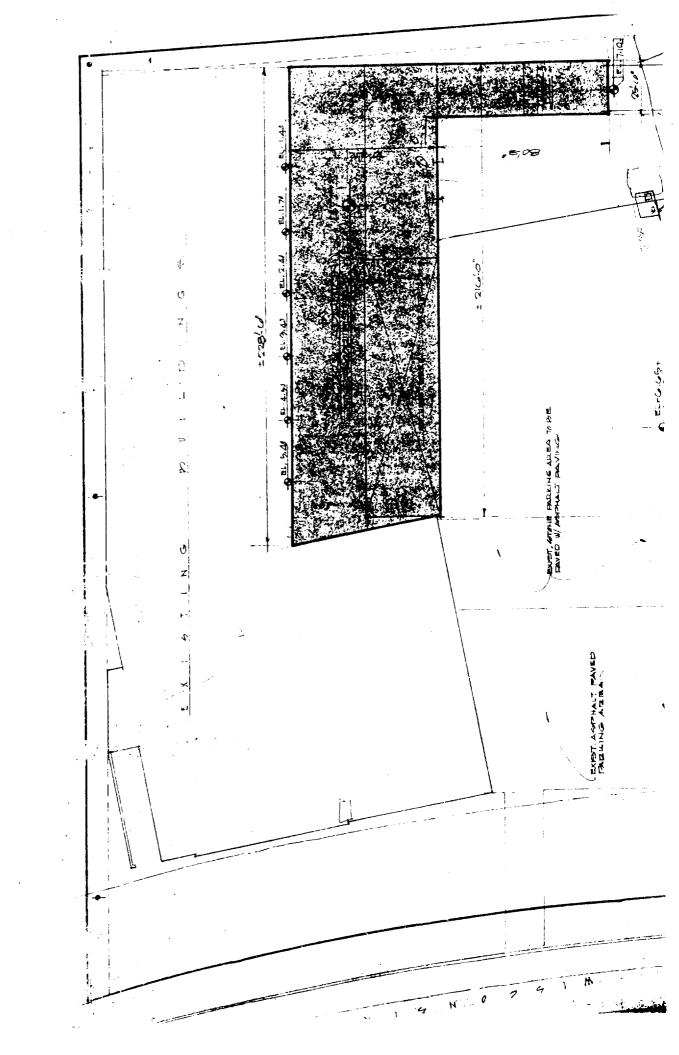
DATE: 12 - 5 - C - C - REVISED

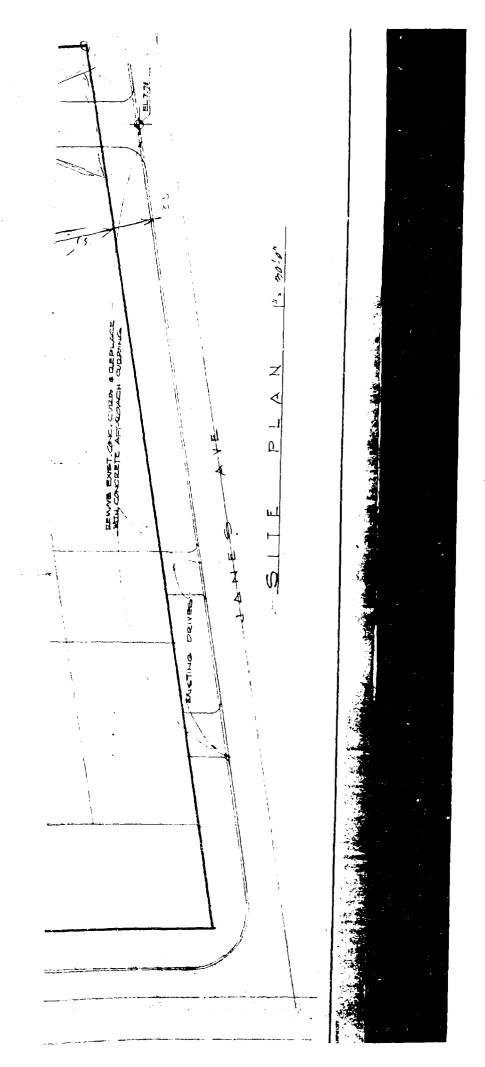
BUILDING ADDITION FOR LIBERTY COFFER 4VICE

WHITE CIZOVE

DUNDATION DETAILS STE PLAN 1/201

ATTACHMENT 8





214.34 ATTACHMENT 10 PINE ) CRUSHED STONE PARKING LOT & DRIVE FARKING FOX 21 C TATOR ( Exist March 17 19) 14 SINIS TO SERVE SAUTTARY Tomaten Exist SEWER. CROSS SECTION WISCONSIN

TOTTED LIGHT ENDICATES EXISTING GENCE

Poof & PLOT P

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14 NHT

ECPERTY FINE

145 E. Algonquin Road Arlington Fieights, IL. 60005 Phone: 708-228-0668 Fax: 708-228-0358

9800 S. Roberts Road Palos Hills, IL 60465

Phone: 708-430-4077 Fax: 708-598-6580



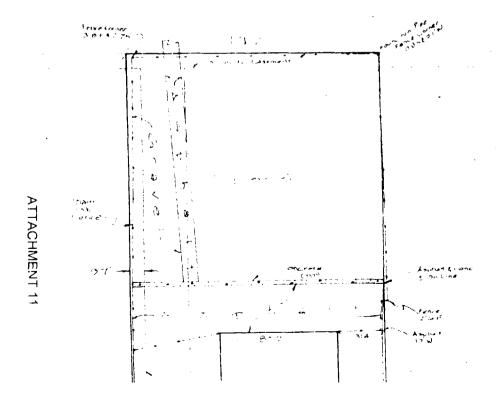
## PLAT OF SURVEY

218 N. County Street Waukegan, IL 60085 Phone: 708-336 2473

Fax: 708 336-2113

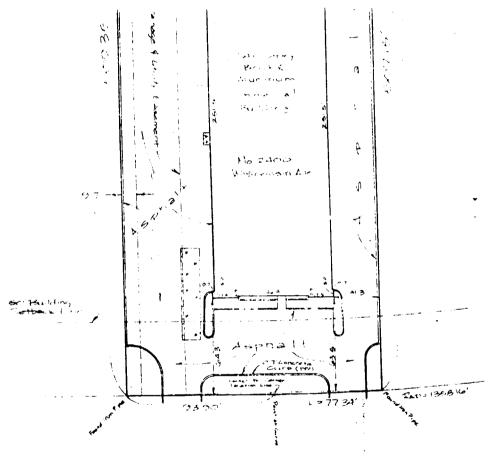
373 S. County Farm Road Wheaton, IL 60187

Phone. 708-690-3733 Fax: 708-690-6985



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WISCONSIN

AVENUE

All distances shown are in feet & decimal parts thereof.

Scale 1" = 50"

Job No. 205927

Ordered by T LOTATA

NOTES: Only those Building Lines or Easements shown on a Recorded Subdivision. IMPROPERT Plat are shown hereon unless the description ordered contains a proper description of the required Building Lines or Easements.

No angles or distances are to be determined by scaling

Compare your description and site markings with this plat and at once report any discrepancies which you may find

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18.8.

COUNTY OF TARE 50

ON BUBBLE OF MID AMERICA SURVEY COURANY,
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LINES AS MONUMERIED AND THAT THE APPOINTING
IMPROVEMENTS DO NOT ENCROACH UNLESS MONN.
PAIRD
1991.

MID AMERICA SURVEY COMPANY

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HEGGSTERED ILLINOIS LAVES

